Supreme Court, U.S.
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IN THE SUPREME COURT OF THE UNITED STATES

ROSEMARY HELEN ZIZIROS WALKER, Applicant,

v.

PURDUE PHARMACEUTICALS AND THE SACKLER FAMILY, Respondents.

On Application for a Stay Pending Certiorari to the Supreme Court of Oregon

Oregon Supreme Court No. S073172 Oregon Court of Appeals No. A190941 Marion County Circuit Court No. 23CV33935

EMERGENCY APPLICATION FOR AN IMMEDIATE ADMINISTRATIVE STAY AND STAY PENDING CERTIORARI

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TO JUSTICE ELENA KAGAN, CIRCUIT JUSTICE FOR THE NINTH CIRCUIT:

Applicant Rosemary Helen Ziziros Walker, a qualified disabled patient victim and pro se pauper, requests an immediate administrative stay and a stay pending the timely filing and disposition of her petition for a writ of certiorari concerning Oregon Court of Appeals No. A190941 and Oregon Supreme Court No. S073172. She invokes 28 U.S.C. §§ 1257(a) and 2101(f) and Supreme Court Rules 22-23. Separately, she requests limited interim protection under 28 U.S.C. § 1651(a), subject to its requirements, against use of her disputed Purdue Pharma bankruptcy consent release election to extinguish her existing direct Sackler Family claims.

Ms. Walker seeks an immediate emergency stay to preserve her rights-not to surrender them between courts. This application to Justice Kagan arises from the Oregon proceedings concerning Marion County Circuit Court case No. 23CV33935 against Purdue Pharma and the Sackler Family; her related federal appeals challenge confirmation of the entire Purdue bankruptcy Plan as violating Harrington. Davis Polk sought the SDNY Bankruptcy Court injunction against her Oregon action. She relied on Judge Sean H. Lane's and the Debtors' representations that her timeliness issue would be addressed before the Plan's Effective Date, but adjudication followed effectiveness while her disputed release election remained unresolved. Judge Lane's July 1, 2026 decision stated that denying her late claim did not affect her legal rights concerning claims against the Sacklers in her state-court lawsuit. Ms. Walker pursued review in the Oregon Court of Appeals and Oregon Supreme Court, but her underlying claims have not received a hearing or trial on their merits. Proceeding without counsel, she remains confused about which issues each court could decide and when and how she was required to present them. In May 2026, nearly three years after filing, a Marion County judge wrote "Service not Complete"-a statement she challenges through corrected court and sheriff records concerning errors she did not make. She asks this Court to preserve

both parts of her Oregon action, Marion County Circuit Court No. 23CV33935-her claims against Purdue Pharma and her separate claims against the Sackler Family-together with Purdue PI Claim No. 634787 in the SDNY bankruptcy, her federal appeals, and her requested Trust review. Seeking compensation from Purdue must not be treated as surrendering her Sackler Family claims, and pursuing those claims must not be treated as abandoning her Purdue claim or court and Trust review rights. She seeks protection pending meaningful review of her Amendment I rights to petition the Government for redress of grievances and speak freely; her Fifth Amendment right to due process; her Fourteenth Amendment rights to due process and equal protection; and her disability rights and protections under ADA Titles II and III, to the extent applicable.

I. Harrington and Walker's Existing Rights

In Harrington v. Purdue Pharma L.P., 603 U.S. 204 (2024), decided June 27, 2024, this Court reversed the Second Circuit and remanded. Walker seeks protection of her existing claims under its holding:

> "we hold only that the bankruptcy code does not authorize a release and injunction that, as part of a plan of reorganization under Chapter 11, effectively seeks to discharge claims against a nondebtor without the consent of affected claimants." Harrington, slip op. at 19.

Harrington left open what qualifies as a consensual nondebtor release. Id., slip op. at 19. Walker presents that unresolved question through her original election, her documented change of ballot before the March 1 deadline, and the deferral of her consent dispute until after the Plan became effective.

THE COURT:

> "I will ask the folks from the plan administrator as you can see, there is still an issue about this opt-in, opt-out about Ms. Walker feels very strongly, was on my list to talk about, to say, when are we going to schedule a hearing on that issue? and so let me ask folks for their wisdom on that procedurally whether it's going to be handled at a later hearing. But probably frankly, sometime soon because it needs to be addressed."

May 20, 2026 Hr'g Tr. 59:15-22.

Walker invokes the First Amendment right to petition; the Fifth Amendment Due Process Clause as to the federal bankruptcy process; the Fourteenth Amendment, § 1 Due Process and Equal Protection guarantees as to the state-court process; Article III; and her federal disability-access rights.

Walker also invokes the Americans with Disabilities Act, Title II, 42 U.S.C. §§ 12131-12134, and Title III, 42 U.S.C. §§ 12181-12189, to the extent applicable to the entities and conduct challenged.

II. Walker's Story and Chronology

Ms. Walker was dropped in a malfunction elevator on her way to work.

In 2020, mid-COVID lockdown, Marion County, Oregon had declared disaster fires, followed by an ice storm that caused a tree to crash through her roof. Walker fled to a hotel someone SET ON FIRE. All that followed by a breast cancer scare. Walker had no internet at times. Walker was busy surviving. Ms. Walker provided photographs, a renters-insurance check, and Lynette Brown's email from Salem Housing Authority as evidence to the Court and Debtors.

Lynette Brown, Salem Housing Authority

February 24, 2021

Subject: RE: FIRE IN THE HOTEL

"Oh my heavens… this is unbelievable."

Walker filed her lawsuit on August 21, 2023, as soon as she heard about a Purdue Pharma case before the U.S. Supreme Court. Walker, not being a lawyer, had no idea it was an SDNY bankruptcy or that Harrington was decided on June 27, 2024, reversing the first confirmed Purdue bankruptcy plan. She contends that a new bar date should have been set after Harrington because Americans continued to be injured by Purdue Pharma brand drugs. Justice

Kagan, how can a bankruptcy court constitutionally infringe an American's Amendment I right to petition the Government for redress of grievances?

Ms. Walker included PROOF OF BEING PRESCRIBED PURDUE PHARMA BRAND drugs.

Marion County accepted and served Walker's documents to CT CORPORATION SYSTEM, identified in the Oregon Secretary of State public registry.

The Sackler family never responded to Ms. Walker's lawsuit.

Marc Tobak of Davis Polk contacted Walker concerning her Marion County lawsuit and the SDNY bankruptcy.

Walker specifically asked Tobak whom he represented, emailing him directly on October 20, 2023. Tobak responded on October 22, 2023:

> "Ms. Walker, I represent only Purdue Pharma and its affiliated debtors in their bankruptcy cases. I do not represent Purdue in any other case, and do not represent any of the Sacklers. Best, Marc"

Justice Kagan, after receiving documents stating that her Marion County, Oregon case was being "enjoined" to the SDNY bankruptcy, Walker discovered that Davis Polk had entered her case number and caption incorrectly. Christine Azzaro, from Judge Lane's office, asked for correction on Walker's behalf. Paul Schwartzberg of the U.S. Trustee's Office wrote in an email that it was the Debtors' document. Walker contends that those errors remain uncorrected. This is her real life, and she is not just a number. Her life is attached, as are thousands of other numbers.

Ms. Walker, not being a lawyer, with ongoing medical conditions, understood herself to now be part of the Purdue Pharma bankruptcy.

Ms. Walker sought default against the Sackler Family 30 days after filing her lawsuit. She filed again after confirmation and the Effective Date, understanding that her Sackler claims could finally proceed when the Purdue Pharma injunction was lifted.

Walker submitted her Purdue PI claim form on July 28, 2025, by the PI Trust deadline.

Paragraph 6 of the September 19, 2025 Debtors/UCC filing states:

> "The Debtors and the Creditors' Committee note that, in addition to believing that her 2023 lawsuit constituted a filing of a valid and timely proof of claim against the Debtors, Ms. Walker appears to have confused the …"
>
> September 19, 2025 filing ¶ 6 (excerpt), signed by Arik Preis, Akin Gump Strauss Hauer & Feld LLP, counsel to the Official Committee of Unsecured Creditors of Purdue Pharma L.P., et al.

Walker voted and opted in under the Thirteenth Amended Plan by September 30, 2025; the confirmed Plan is the Eighteenth Amended Plan. The UCC held pre-confirmation Zoom meetings. Walker participated, objected, sought stays and appellate review, and requested an amendment permitting revocation. She challenges conditioning deemed allowance and more favorable compensation treatment on releasing the Sackler Family, while not opting in leaves a Purdue claim subject to objections and an 18-month payment wait. Her timeliness issue and attempted revocation were not resolved before effectiveness as she had relied upon.

The Plan became effective May 1, 2026. Walker's late-claim hearing followed on May 20; her claim was disallowed July 1. She challenges that sequence, the disallowance, and inconsistent application of Pioneer to her circumstances.

III. Consent Unresolved Before Effectiveness

Walker challenges the Catch-22: reliance on her original release election without the corresponding deemed-allowance treatment, while her consent objection and the legal effect of her revocation remained unresolved. Those questions affect her already filed Oregon case 23CV33935.

MS. WALKER:

"Right. But I can revoke. Because I opted in and approved the plan. But that doesn't mean that that's going to stay that way if my claim is not approved. Then I'm going to revoke my release of the Sacklers."

Nov. 13, 2025 Hr'g Tr. 102:25-103:3.

THE COURT:

"What I understood Ms. Walker to be asking just a minute ago was what happens with her release and her release and her opt-in if her claim isn't allowed."

Nov. 13, 2025 Hr'g Tr. 104:1-3.

MR. HUEBNER:

"And so the election I think within the extended window that has been provided does have to be made. And it's irrevocable. You don't get sort of a do-over based on what happens with the trust distribution procedures with your claim with respect to, you know, revoking essentially the affirmative opt-in that you previously gave on your ballot to participate and be a releasing party."

Nov. 13, 2025 Hr'g Tr. 106:14-20.

MS. WALKER:

"Well, I would like it in an amendment and so that we do have -- you know, claimants do have the right to revoke release."

Nov. 13, 2025 Hr'g Tr. 112:8-10.

THE COURT:

"All right. All right."

MS. WALKER:

"Okay."

THE COURT:

"Thank you very much."

Id. at 112:11-13.

The Court responded in the affirmative.

THE COURT:

"It took me awhile to understand why Ms. Walker was so intent on the sequencing of things. And I think that was ultimately her point. How do I know if I want to give this up if I don't know if it actually gets me anything?"

Nov. 14, 2025 Hr'g Tr. 49:18-22.

MR. VONNEGUT:

"So if you grant the release, if you tick the box on your ballot, your claim is therefore deemed allowed --"

Nov. 14, 2025 Hr'g Tr. 52:5-6.

THE COURT:

"So it's more like a provisional allowance than an actual allowance. All right."

Id. at 52:7-8.

MR. VONNEGUT:

"Correct. Correct. But again, it only occurs **at emergence**. So if your claim gets disallowed **prior to emergence**, you're not bound to the release, you're not treated as a claimant in the case."

Id. at 52:9-12.

Addressing the Plan's meritorious-claim standard for Sackler recovery, the Court stated:

THE COURT:

"So the idea here is to satisfy the "meritorious claim" standard, the standard is exceedingly low. It is evidence that you took the drugs in question, period, full stop."

Nov. 14, 2025 Hr'g Tr. 100:18-21.

MS. WALKER WAS PRESCRIBED PURDUE PHARMA BRAND DRUGS FOR MANY YEARS.

THE COURT:

> "And I appreciate Mr. Vonnegut's clarification. There's a deadline to make this decision. You've already done it because you filled out a ballot. But there is -- in your situation, the timeliness of your claim is going to be addressed before what is being referred to as emergence or the effective date. And that means if it is for some reason disallowed, you will not have given any release. And if it is allowed, then the release and your compensation will track. Okay?"
>
> Nov. 14, 2025 Hr'g Tr. 61:19-62:2.

Walker contends that deferral beyond effectiveness, followed by disallowance, negated her Plan vote and separate release election without resolving her timely revocation and Harrington consent objection.

THE COURT:

> "We had a discussion about Ms. Walker's issue. And I will say she's got a pretty good grasp of the Bankruptcy Code for somebody who isn't a bankruptcy lawyer."
>
> Nov. 14, 2025 Hr'g Tr. 97:6-8.

MR. HUEBNER:

> "But one thing I want to be super clear about -- and Mr. Vonnegut will definitely keep me honest here -- the issue of I have a late claim, I submitted a ballot in which I indicated that I wanted to participate in the settlement and therefore released the Sacklers, my claim is thereafter barred as late, your ballot is voided. And so you do not run that Catch-22 trap of I may well have a phenomenal claim, I was just late, but now I can't sue anybody. So again, with kudos to Ms. Walker, that was a very, very reasonable question. And a bunch of us had -- others, because other people knew the answer -- had to go look at it to triple check. That obviously is different than what Your Honor talked about, which is to the extent that somebody elects to participate and ultimately in the TDP they are found not to have a meritorious claim, there they are not allowed to say, well then wait, now I want to go back. And as Your Honor pointed out and we certainly agree, one of the reasons everyone agreed to it is if your claim isn't even meritorious against the company among many other things, the notion that you nonetheless have a valid claim against the company's officers, directors or owners is an extremely attenuated proposition to say the least. And at the end of the day what people opted for was the opportunity to have a higher distribution should their claim be allowed. But if their claim is not allowed on the merits because they can't prove it up, then the consequences are what they are."
>
> Nov. 14, 2025 Hr'g Tr. 98:23-99:23.

MS WALKER CAN 'PROVE IT UP'

MR. HUEBNER:

> "And so the March 1 date finally is not sort of like a global new election date, it's if anybody wants to make the determination to change the election on their ballot they already made. There's not going to be some new solicitation."
>
> Id. at 99:24-100:3.

There should have been.

MR. HUEBNER:

> **"We'll accept notices from someone saying hey, you know, now that I understand things better, I previously opted either in or not opted in, I would like to change that. So it's a last chance to change what we already did. It's not a whole new process for giving people a new election deadline."**
>
> Id. at 100:5-10.

Walker contends that the Court and Debtors never added a revocation mechanism implementing Huebner's representation that someone who had already opted in could

change that election by the new March 1, 2026 deadline. Her objection concerns the promised ability to revoke an existing opt-in, not merely another opportunity for someone who had not opted in to do so.

Walker repeats Huebner's exact words because they identify the issue and the promised solution: "I previously opted either in or not opted in, I would like to change that." Nov. 14, 2025 Hr'g Tr. 100:7-8. The Debtors knew exactly what Ms. Walker's issue was and identified the solution, yet never provided the mechanism in the Plan to do it. Walker contends that they lied on the record.

THE COURT:

> "All right. Thank you. And again, I appreciate it. I know we've been peeling the layers of this back. I think it's worthwhile. It's an important issue. And so I just want it to be very clear. And I appreciate the education."
>
> Id. at 102:22-103:1.

THE COURT:

> "And so Mr. Walker's question spurred some very useful information on the record."
>
> Id. at 103:2-3.

MR. HUEBNER:

> "And a new fixed deadline."

THE COURT:

> "And a new fixed deadline."

MR. HUEBNER:

> "So she changed the plan."
>
> Id. at 103:4-6.

After no one acknowledged her revocation, Ms. Walker found her original ballot, logged in, and unchecked the Sackler-release opt-in box.

Kroll's February 6, 2026 email acknowledged the submission under confirmation number 2325-2-FXRCB-075191492:

> "We are in receipt of your Purdue Pharma L.P. E-Ballot submission."

Kroll stated that "the most recent submission will supersede the previous one," while reserving the "ultimate determination as to whether the submissions are accepted and valid" to Debtors' counsel.

The later statements show why Walker disputes implementation:

On February 4, after Walker asked for written confirmation of revocation, counsel acknowledged her repeated requests:

MR. KAMINETZKY:

> "She now wants to change her vote, and has made numerous filings, asking to change her vote from opting in to not opting in. That's going to be heard in March, at the omnibus hearing, and Your Honor will decide what you decide."
>
> Feb. 4, 2026 Hr'g Tr. 51:1-4.

THE COURT:

> "We'll address it at the appropriate time. Yeah."
>
> Id. at 51:5-6.

Ms. Walker just heard the exact same sentiment at the last hearing, five months after the Effective Date, when Purdue no longer even exists. The appropriate time & sequencing was prior to effective.

On February 26, counsel described the absence of an opt-out date after an existing opt-in:

MR. TOBAK:

> "Absolutely. So opt out is actually, sometimes we use that colloquially, but it's incorrect in this case, as Your Honor well knows. At the time of voting, so last year, creditors were offered the choice, in addition to participating in this bankruptcy, which were claimed against the debtors, against Purdue, is in the bankruptcy by operation of law. Do you want to also participate in a separate but related settlement with the Sacklers and other third parties? And if you elect yes, if you affirmatively check a box yes, then both of your claims, or both sets of your claims, your claims against the debtors and your claims against the Sacklers and other third parties will be treated through this process. You'll get an additional augmented chance of recovery by giving that option. March 1st is the deadline to opt into that if you have not yet opted in. The plan did not provide for a date to. If you already elected to opt in, it did not provide for a date to opt out. And the reason for all of that is multifold. And we explored this a bit at the confirmation hearing, but in a really small nutshell, it's that the question is whether you want to participate in this process with respect to your claims against the Sacklers or not. And the reason that nobody knows necessarily the answer to whether your claim has been administered, because the administration process for claims against the estate, to which you can also add your claims against the Sacklers, is a sort of separate process. And the question to you, do you want to join that process or do you want to say, no, I don't want the chance for an augmented recovery, I prefer to keep my claim against the Sacklers and potentially pursue that in state court or federal court or some other venue in the future."
>
> Feb. 26, 2026 Hr'g Tr. 84:1-85:7 (wording as transcribed).

The Purdue PI Trust's March 2, 2026 email stated that "your deficiency letter does not state that you did not file a claim with the Purdue PI Trust" and that "**the evidence meets the requirements for a Tier 2 claim.**" Walker appealed, seeking Tier 1 treatment.

On March 19, after the March 1 deadline:

MR. SHINBROT:

> "Those issues will be decided at a later date. We will address Ms. Walker's late claim motion with other late claim motions. And with respect to Ms. Walker's election on the releases, Ms. Walker has submitted two ballots. One elected to participate in the releases. Another one did not elect to participate in the releases. We're trying to work through what all of that means, but that issue is just not on for today."
>
> March 19, 2026 Hr'g Tr. 76:4-11.

MS. WALKER:

> "But it's on the agenda."

Id. at 76:12.

Marc Tobak, March 20, 2026 email proposal to deem Ms. Walker's claim timely:

> "The Debtors will ask Judge Lane to deem your late-filed claim to be timely." "The Debtors will ask Judge Lane to treat your February ballot as effective, meaning that you will be treated as a person who filed a timely claim and who did not opt-in." "The Debtors will agree that we will not object to your claim."

Walker declined the proposal, stating that the Debtors' promise not to object would still leave her waiting until 18 months after the Effective Date, while other parties in interest could object during that period. She contends this was inconsistent treatment despite her qualifying-drug evidence.

During the April 28, 2026 sentencing hearing, Walker emailed Arik Preis asking what "consummated" meant. He replied: "Consummated is synonymous with going effective." Emails, April 28, 2026.

A second proposal conveyed through Preis on May 19, 2026 likewise contemplated deemed timeliness, recognition of Walker's February non-opt-in ballot, preliminary Tier 2 treatment, and no objection by the Debtors. Walker states that both proposals conditioned that treatment on surrender of her Plan appeal rights. Neither proposal was a final judicial allowance of her claim.

MR. VONNEGUT:

> "The answer is that if the late claim motion is denied -- or sorry, if the late claim motion is denied and the claim is disallowed, then the opt-out is moot. And no further action needs to be taken to revoke the opt-out for a claimant whose claim is denied."
>
> May 20, 2026 Hr'g Tr. 61:16-20.

Ms. Walker initiated the second proposal to obtain her Purdue compensation before the post-effective-date late-claim hearing, while feeling overwhelmed. In the ensuing email correspondence, Huebner asserted on August 4, 2026 that "the March 1 issue did not apply to you at all (and never did)" and that "the elections you made on your two ballots no longer have any relevance because your claim was denied as untimely." Walker challenges those

assertions: her question prompted the new deadline, and Huebner expressly stated:

> **"We'll accept notices from someone saying hey, you know, now that I understand things better, I previously opted either in or not opted in, I would like to change that."**
>
> Nov. 14, 2025 Hr'g Tr. 100:5-8.

Huebner then stated: "So she changed the plan." Id. at 103:6. Her timeliness issue was nevertheless decided after effectiveness, contrary to the sequence represented on the record.

THE COURT:

> "As explained in the Court's decision on her late filed claim motion, Ms. Walker retains any rights that she has to sue the Sacklers, who are not debtors in these bankruptcy cases. In re Purdue Pharma L.P., 2026 WL 1905691 (Bankr. S.D.N.Y. July 1, 2026) n.6 (noting that only claimants can participate in the Sackler settlement)."
>
> Dkt. 9439, footnote 3 (July 10, 2026).

THE COURT:

> "You are obviously free to appeal. That's perfectly fine."
>
> Nov. 18, 2025 Hr'g Tr. 10:20-21.

Walker's Purdue claim is Claim No. 634787.

Walker challenges the $500 Trust appeal fee as an unfair TAX on victims. The fee applies regardless of outcome, and nonpayment results in dismissal. Non-NAS PI Trust Distribution Procedures § 13, at 11. She has sought a fee waiver or removal of the charge, twice requested a special-master hearing, and twice sought Trust administrative review. She states that her second review request followed the October 1, 2026 deadline.

Section 13, footnote 23, excludes claims finally disallowed under the Plan from the Trust's administrative appeal process and preserves judicial review in the appropriate appellate court.

Mr. Preis's characterization did not replace Ms. Walker's own question. She asked whether Mr. Gentle's determination that she had a valid claim would count in the Court's decision and which decision came first. Neither the Court nor counsel clearly answered that complete question. Nov. 13, 2025 Hr'g Tr. 158:3-159:19.

For access to justice in her Oregon action, Walker invokes Article I, section 10 of the Oregon Constitution: "justice shall be administered, openly and without purchase, completely and without delay." She invokes that protection alongside her federal due-process and petition arguments.

Walker also invokes Oregon Constitution Article I, sections 10 and 42, ORS chapter 147, and New York Executive Law Article 23, §§ 640-642. ORS 147.315 prohibits charging an applicant a fee in proceedings under ORS 147.005 to 147.367. Article I, section 42 protects participation, dignity and respect in criminal and juvenile delinquency proceedings. Walker invokes these victim-protection policies by analogy in seeking removal or waiver of the Trust fee and meaningful review without purchase or delay; she does not represent that Oregon's compensation statute automatically governs the Purdue Trust.

The Catch-22: retained Sackler rights, disallowance, and requested Trust review

Claim disallowance is invoked to moot Walker's consent dispute; the Trust excludes finally disallowed claims from administrative review; and her Oregon action remains dismissed. If allowance is restored, her original opt-in and attempted revocation still require adjudication. She disputes treating restored allowance as automatically reviving an irrevocable release. Recognition of retained Sackler rights resolves neither that issue nor Oregon service, liability, or the available review route.

Davis Polk submitted the injunction materials identifying Walker's Oregon action. The SDNY Bankruptcy Court stated that the preliminary injunction would end at the Effective Date, May 1, 2026. Oregon does not administer that bankruptcy or decide her federal bankruptcy appeal. Requested Trust review cannot be assumed to overturn judicial disallowance.

THE COURT / Judge Sean H. Lane:

> "I understand that all of the Creditor constituencies support the extension of the preliminary injunction at this point so as to accomplish what needs to be done between now and the effective date when that injunction will be lifted."

Nov. 18, 2025 Hr'g Tr. 119:4-8.

THE COURT / Judge Sean H. Lane:

"And we're on the verge of the effective date at which point the preliminary injunction will cease to exist."

March 19, 2026 Hr'g Tr. 92:1-2.

IV. Requests to Preserve the Status Quo

MS. WALKER:

"Were the issues about the rider with Richard Sackler resolved? That was also brought up yesterday. And if they are not resolved, then that is a reason for this not to go through."

Nov. 13, 2025 Hr'g Tr. 101:13-16.

Later that day, Vonnegut reported acceptance of the rider and a commitment to complete and execute remaining settlement documents under a timetable, Court supervision, and an enforcement mechanism. Id. at 165:9-15.

THE COURT:

"I just want it to be clear as a bell on the record that that's agreed to. And while I can sign an order, me signing it doesn't mean anybody's agreed to it, I've learned, over the course of 15 years."

Id. at 168:4-8.

After Ms. Penachio confirmed Richard Sackler's agreement to the rider, the Court stated:

"All right. All right, thank you very much for the update. I appreciate that, and Ms. Walker had it right in the sense of saying you want as many uncertainties to be addressed as possible, and so I'm happy to have that -- to hear that good news."

Id. at 169:4-8.

Walker contends this record shows why she sought a stay before confirmation: the Court knew that uncertainties and document-completion issues required attention before rights were altered.

THE COURT:

> "Ma'am -- ma'am -- ma'am, ma'am, ma'am -- ma'am, I haven't even made a ruling or entered an order. So the appeal comes after that. So I need to make a ruling, so first things first. We've got to --"
>
> Nov. 18, 2025 Hr'g Tr. 10:8-11.

MS. WALKER:

> **"Well, the stay -- a stay is, so that everything is held right where it is when I applied for the appeal and the stay."**
>
> Nov. 18, 2025 Hr'g Tr. 10:23-25.

THE COURT:

> "Could someone please mute Ms. Walker?"
>
> Nov. 18, 2025 Hr'g Tr. 11:6.

After the May 1, 2026 Effective Date, at the May 20 hearing, the Court addressed preservation of the status quo:

THE COURT:

> "Well, so what I'm going to say is, it really doesn't help the issue, because then it pushes people to make requests of me to issue injunctions on a TRO basis to say, 'This could potentially be a problem, and we should keep the status quo.' ... So I'm going to assume that the record I have now of issues to be addressed is the record I have, and that people are going to hold off, and let's get through it."
>
> May 20, 2026 Hr'g Tr. 40:3-11.

THE COURT:

> "But that's what TROs are designed to do. Temporary restraining orders are designed to maintain the status quo until Court gets a chance to rule."
>
> May 20, 2026 Hr'g Tr. 40:18-20.

MS. WALKER:

> "Judge, I would like to motion for a TRO, please."
>
> May 20, 2026 Hr'g Tr. 41:15-16.

Ms. Walker has repeatedly requested a stay in the SDNY Bankruptcy Court, the SDNY District Court, and the Second Circuit. She contends that a stay should have been granted almost a year ago.

V. Oregon Proceedings and Federal Review

Article III, §§ 1-2 establishes the federal judicial power over specified cases and controversies, including federal constitutional and statutory questions. Walker invokes appellate jurisdiction under 28 U.S.C. § 1257(a), with the separate requirements of §§ 2101(f) and 1651(a) addressed below; Article III alone does not bypass those requirements.

Walker sued Purdue Pharmaceuticals and The Sackler Family, Marion County No. 23CV33935. The current party record names both and records September 19, 2023 service entries. Walker explains that the Oregon court incorrectly entered her case into its computer, the sheriff's paperwork followed that error, and both corrected their mistakes when she identified them. Davis Polk separately entered the wrong New York case number. Ms. Walker had no access to their computers and did not make those errors.

The May 7 ruling: the specific service determination challenged

The May 7, 2026 judicial endorsement states "Service not Complete." The amended sheriff's return certifies delivery of the summons and complaint/judge assignment at 2:11 p.m. on September 19, 2023, identifying "PURDUE PHARMACEUTICALS AND THE SACKLER FAMILY," through Eden Titus at CT Corporation System's Salem registered-agent address. The July 31 register records the amended return as filed May 6, 2026, before the denial. Ms. Walker contends that the Oregon courts failed to meaningfully consider the corrected court and sheriff records, leaving her claims without a merits hearing and denying her due process. The Sackler Family never responded to her lawsuit; Marc Tobak of Davis Polk responded concerning the bankruptcy, expressly stating that he did not represent any Sacklers. Walker seeks determination of her default request against the Sackler defendants.

Walker asks that the stated service ground be reconciled with the corrected return. The endorsement does not explain why it was insufficient. Her objection is to that unexplained conflict, not an assertion that an unanswered complaint automatically establishes entitlement to her proposed award. Her handwritten assertions are not judicial findings.

The June 17 and June 23 dispositions: separate rulings, separate questions

On June 17, 2026, the Court of Appeals dismissed A190941 because denial of the proposed general judgment was not appealable under ORS 19.205. Walker disputes that ruling; it did not decide her claims' merits or release election. A separate judgment, signed June 22 and entered June 23, dismissed without prejudice, stated no ground, and awarded no costs or fees. That later judgment must not be conflated with the earlier appeal.

The June 17, 2026 order names Purdue Pharmaceuticals and The Sackler Family in its caption, but its copy list names only Purdue Pharmaceuticals. Ms. Walker is a qualified disabled pauper and states that she again appealed the fee. She invokes Oregon Constitution, Article I, section 10: "justice shall be administered, openly and without purchase, completely and without delay." She contends that both purchase and delay have wrongly been imposed on her.

The Oregon Supreme Court denied review and limited remand September 10, then denied reconsideration and separately denied a stay September 29. Walker sought preservation below before applying here and challenges whether that process afforded meaningful access to present her federal claims and corrected record.

An adequate and independent state-law ground is an obstacle under § 1257(a). Michigan v. Long, 463 U.S. 1032, 1041-42 (1983). Walker's federal challenge concerns denial of meaningful access in applying the procedural ground to her actual efforts, corrected record, and disability barriers; a service-record error or Harrington alone does not establish appellate jurisdiction.

Staying the June 17 dismissal alone would not vacate the separate June 23 judgment, revive the trial action, or suspend a federal injunction. Walker separately requests interim protection against use of her disputed release election under § 1651(a), within this Court's authority.

Walker asks the Court to examine each order with her actual submissions, dates, and accommodation requests before attributing abandonment or failure to respond. If she did not initially understand that an order required a response, she states that she responded when she understood.

VI. Due Process and Disability Rights

A. September 10: Oregon rights discussed without Walker's participation

MR. HUEBNER:

> "The one issue, Your Honor, that may be coming up is that -- I don't want to name names because, you know, no one else is here and it's not appropriate to speak about a specific party and things on the record." Sept. 10, 2026 Hr'g Tr. 5:23-25, 6:1.

MR. HUEBNER:

> "One party who this Court essentially found a vexatious litigant and has also been similarly treated by Judge Roman is now moving to add multiple estate-related parties to state court litigation in Oregon." Sept. 10, 2026 Hr'g Tr. 6:4-7.

MR. HUEBNER:

> "We may end up deciding to file a motion before this Court seeking a judgment that this is a direct violation of the injunction order in multiple ways and just essentially then send that to the Oregon courts so that they know, because obviously this Court is very familiar with these issues, having ruled on them multiple times." Sept. 10, 2026 Hr'g Tr. 6:21-7:2.

Ms. Walker has been bullied, threatened & defamed for daring to enforce her rights.

The transcript does not list Walker as appearing. The Court reserved the merits for any future motion. Id. at 7:4-13. Walker contends that discussion of her Oregon litigation without an equal opportunity to answer impaired due process, petition rights, equal protection, and

meaningful disability access.

After the September 10 hearing, Christine Azzaro responded to Walker's earlier efforts to submit her objections when the court's pro se upload tool failed:

> "Good afternoon Ms. Walker, I hope you are well. I apologize for the delay in responding, but I wanted to let you know that I no longer work for Judge Lane. As a result, I am not allowed to work on the cases that are assigned to him."

B. Claim disallowance, Pioneer, and the PAT: no cross-examination

At the May 20 hearing, PAT counsel described why other late claims had been allowed:

MS. TOWNES:

> "More often than other types of individuals, so for 27 of the 34 where their late claim motions were granted, the Debtors in the UCC would agree that incarcerated individuals who filed motions were able to provide sufficient reasons given the circumstances related to their incarceration. That meant they had limited access to resources or time outside of their cells, which severely limited their ability to submit Court papers. We also found that those circumstances were compounded by other factors, such as additional limitations on resources and their freedom of movement related to COVID-19 restrictions that were applicable, or some prohibitive medical conditions that certain of them had. In just a few instances, non-incarcerated individuals, we believed, were able to meet the standard based off of their assertion that certain acts of God, such as a tornado hitting their home or medical conditions prevented them from filing a proof of claim earlier. And notably, in all of those cases, they filed their late claim motions, at least, by early 2022."
>
> May 20, 2026 Hr'g Tr. 47:7-48:1.

Four non-incarcerated women's claims were objected to: Walker, Cates, Lojko, and Herrera. Walker contends that Pioneer was inconsistently applied to her combined disasters, poverty, disability, and COVID-era medical circumstances, and that PAT showed no actual material prejudice from allowance. See Section II.

PAT's objection was filed in Trustee Maria Christina Ricarte's name and argued by PAT counsel. Walker contends that disallowance without an opportunity to cross-examine Ricarte on the objection's factual basis denied due process. She maintains that cross-examination is a vital part of jurisprudence & due process.

Walker requested in all courts that Knoa Pharma and PAT be added to her Oregon lawsuit and Purdue claim so that the operational transition and post-effective claim administration would not leave her claims and requested relief without the appropriate parties before the court. The Oregon Secretary of State filing she located on October 17, 2026 is a certificate of cancellation of registration for Purdue Pharmaceuticals L.P., registry No. 215363797, filed May 22, 2026. It identifies Maria Christina Ricarte as the authorized person signing on behalf of the general partner, Purdue Pharma Inc. Walker connects that signature to the PAT objection discussed above.

C. Equal access to the record and meaningful opportunity to respond

Walker only recently obtained some PACER access and still lacks the court fee waiver requested. She contends that past exclusion and continuing fees impede her ability to read and answer the record affecting her rights.

At the May 20 hearing, the MDT's lawyer explained that documents concerning enforcement of the Sackler settlement had been filed under seal and that consent to share them had not been obtained. The Court addressed Richard Sackler's lawyer, Ms. Penachio:

THE COURT:

> "Ms. Penachio, why hasn't there been consent? How is the MDT going to respond to something that they can't read?"
>
> May 20, 2026 Hr'g Tr. 29:10-11.

The Court directed immediate sharing. Id. at 29:15-25, 30:1-3. Walker requests equivalent access to documents affecting her own rights.

The September 17, 2026 correspondence from the Office of the Clerk of this Court separately stated concerning the Oregon Supreme Court docket: "This Court has no access to their docket."

Walker reports malfunctioning Bankruptcy Court and District Court pro se upload tools. She disputes statements that she failed to seek leave: once she understood the requirement, her submissions expressly requested it. She asks that the filings and submission records be examined.

D. Service through the Oregon Secretary of State registry

Wolters Kluwer has now sent Walker three letters and did not serve her documents. Walker called the Oregon Secretary of State and spoke to Diane on September 30, 2026, case number 1208065.

Ms. Walker will call the U.S. Supreme Court before heading to the post office about service.

E. Disability accommodations and legal representation

Walker proposes the following ADA amendment: Disabled Americans have ongoing medical conditions and must have the same equal protection provided to criminals while in any court in America: legal representation to ensure all rights including ADA title rights & fines are enforced.

Walker requests legal representation to enforce her ADA Title II and Title III rights, due process, equal protection, and other rights and applicable fines. She asks the Court to address her need for representation & the complexity of these proceedings.

Ms. Walker has requested maximum ADA fines for infringement of her ADA Title II and Title III rights. She contends that the courts and counsel have targeted, threatened & punished her when she has done nothing wrong at all.

F. Sackler appeal and hearing access compared with delayed adjudication

Justice Kagan, Harrington describes the Sacklers' "milking program." What is the punishment for that conduct?

Walker objects that no Sackler should serve as a fiduciary in light of the "milking program," transfers intended to hinder creditors, and looting Purdue. Harrington, 603 U.S. 204 (2024); DOJ Sackler Settlement Agreement, Addendum A, paragraphs 158-170 (Oct. 21, 2020). Her references to fraudulent wires must be distinguished from the civil fraudulent-transfer claims described in the record.

The Debtors' and UCC's own descriptions of the Sackler transfers include:

MR. KAMINETZKY / Davis Polk, counsel for the Debtors:

> "Mr. Collura's testimony covers the forensic analysis he and his team at AlixPartners performed at the direction of the Special Committee to identify and analyze cash transfers from the debtors to the Sacklers, transfers that are at the heart of the estate claims against the Sacklers, such as fraudulent transfer claims. Mr. Collura's report examined transfers from January 1, 2008 to September 30, 2019."
>
> Nov. 12, 2025 Hr'g Tr. 153:8-15.

MR. KAMINETZKY:

> "David DeRamus, a co-founder partner with Bates White Economic Consulting evaluated these transfers and submitted testimony that the debtors did not receive arms-length value for the intercompany transfers described in Mr. Rule's report. Mr. DeRamus' report estimates that under payments to Purdue Pharma and transfers of value to related parties outside of the debtors totaled $1.4 billion."
>
> Id. at 154:19-25.

MR. PREIS / counsel for the Official Committee of Unsecured Creditors:

> "The only claims the Committee could actually take part in settling were the estate claims -- not the direct claims that individual Claimants may hold against the Sacklers. Specifically, as has been talked about, these are things like fraudulent transfer, breach of fiduciary duty and unjust enrichment. These claims deal with money, about $11 billion, that the Committee believes the Sacklers wrongfully took out of Purdue between 2008 and 2017."
>
> Nov. 14, 2025 Hr'g Tr. 133:2-10.

MR. PREIS:

> "There are bigger issues, like whether the Sacklers should be criminally prosecuted, how the states should use the money they receive in this plan and other settlements. Should the laws about moving money abroad be modified to protect against what the Sacklers did? And should the federal government be forced to use the Sackler money (indiscernible) abatement? All of these questions are things we have and we encourage people to write their governments, write the state and federal governments that represent them. But none of them are things that this case is designed to address."
>
> Id. at 132:5-15.

MR. SHORE / Chris Shore, Ad Hoc Group of Personal Injury Victims:

> "Yes, the Sacklers looted the corporation. But fraudulently conveying suits are damn hard to win, especially old ones. And yes, sometimes people get massive judgments. But the reality is that it takes time and money and collection efforts that sometimes fail."
>
> Nov. 14, 2025 Hr'g Tr. 123:10-14.

The Co-Fiduciaries' Notice to Creditors, Estate of Beverly Sackler, Greenwich Probate No. 19-00460, identifies David Sackler and Richard Sackler and links "Settling Creditor" status to the Eighteenth Plan and release consent. Bankruptcy Dkt. 9132, at 532, likewise lists them as estate representatives. Walker raises a conflict with her creditor interests; those records do not themselves adjudicate ownership of all probate assets. Ms. Walker asserts a conflict because her Oregon action names the Sackler Family, while David Sackler and Richard Sackler serve as co-fiduciaries of Beverly Sackler's estate.

The DOJ deal dates to October 2020, before Harrington. Walker contends that it preceded disclosure of the full extent of Sackler wrongdoing. She challenges perpetual-release protection and inconsistent treatment of Purdue claims despite required evidence, the PI Trust form, a Plan vote, and a separate release election. DOJ Sackler Settlement Agreement, Addendum A, paragraphs 158-170.

Ms. Walker requested sanctions under Confirmation Order ¶ 33(j), which expressly reserves exclusive jurisdiction to the SDNY Bankruptcy Court over nonperformance and sanctions concerning these obligations. She challenges the failure to grant her requested sanctions for

missed document deadlines. Dkt. 8263, ¶ 33(j), at 36.

Richard S. Sackler and Lin Gao appealed the September 11 enforcement order and August 21 ruling on September 25 while identifying pending reargument. Dkt. 9612, at 2. Dkt. 9590 records the June 29 hearing, grants enforcement of the Eighteenth Plan, directs withdrawal of Interference Actions, and requires reimbursement within seven days of fee approval. Their further motion was noticed for October 28, 2026, at 2 p.m. Eastern. Dkt. 9623, at 2. That scheduled hearing is distinct from their appeal.

Walker contrasts that access to hearings and review with deferral of her earlier claim and consent issues beyond effectiveness, contrary to the sequence represented at November 14 Tr. 61:19-62:2. She seeks equally meaningful consideration and preservation before implementation defeats relief.

Ms. Walker has only the hearing transcripts and the Court's, Debtors', and UCC's own representations to rely on. The judge is a lawyer, the Debtors are represented, and the Sackler Family is represented, but Ms. Walker has no legal representation. How is this fair, equal, or just?

JUSTICE DELAYED IS IN FACT JUSTICE DENIED.

If We the People cannot afford the bills to enforce our rights, is the Bill of Rights a fraud? Walker asks for an accessible avenue to enforce hers.

VII. The Three Checkbox Issues

Walker identifies three checkbox issues requiring examination of the underlying facts and legal consequences.

First - the bankruptcy petition.

Official Form 201 required Purdue to describe its business and expressly offered "Health Care Business (as defined in 11 U.S.C. § 101(27A))."

Purdue checked:

"None of the above."

Walker contends Purdue's pharmaceutical operations and administration of prescription-injury patient claims required judicial examination of whether Purdue qualified as a health care business and whether 11 U.S.C. § 333 and Federal Rule of Bankruptcy Procedure 2007.2 required a patient-care ombudsman.

Second - the Sackler release ballot: IF YOU CHECKED THE BOX.

The written release-election instructions posted on the Purdue PI Trust website state:

> "Elect to Grant or Not Grant the Third-Party Releases: You may, through your ballot or your participation in the applicable direct claims shareholder settlement (as described in the Disclosure Statement and the Plan), elect to grant or not to grant releases of any actual or potential claims that you have against Sackler family members, and certain other individuals and related entities, relating to Purdue Pharma L.P. and its affiliated debtors (i.e., the third-party releases). Electing to grant or not grant the third-party releases is completely voluntary, but you may receive less compensation if you do not elect to grant such third-party releases. **The Debtors and the Creditors' Committee recommend that you elect to grant the third-party releases.**"

THE COURT:

> "So again, I can't give you legal advice, so first things first --"
>
> Nov. 18, 2025 Hr'g Tr. 11:2-3.

MR. HUEBNER:

> "I should also note, again, I'm certainly not giving anybody else legal advice. I'm counsel only to the Debtors."
>
> March 19, 2026 Hr'g Tr. 98:15-17.

Ms. Walker argues that the Debtors and the Creditors' Committee DID GIVE LEGAL ADVICE in the posted document by recommending that claimants grant the third-party releases. She argues that this advice, coupled with the warning of reduced compensation for not granting releases, was coercion.

The September 30, 2026 Trust update states that Qualified and Non-Participating claimants are not potentially eligible for payment until 18 months after effectiveness. The release instructions above do not explain that delay or the absence of release-based deemed allowance and continuing exposure to objections. See Non-NAS PI FAQs 15-16, 28. Walker challenges those consequences despite her qualifying-drug evidence and completed submissions.

Walker contends that this written recommendation advised unrepresented claimants to surrender their legal claims and, coupled with the warning of reduced compensation, is evidence of coercion.

The release box must be read with the complete on-record exchange in Section III: Vonnegut stated that ticking the box meant the claim was deemed allowed, while the ensuing exchange qualified allowance and release by what occurred **at emergence** and **prior to emergence**.

Third - Walker's medical record.

Walker's pain-management records repeatedly contain the checked notation:

> "NO CHANGE IN MEDICATIONS."

Walker supplied records of Purdue-brand OxyContin treatment. She contends that "NO CHANGE IN MEDICATIONS" reflects continued treatment even when the drug's name was not repeated at every visit.

VIII. Nationwide Importance, Accounting, and Accountability

The national claims and release process affects Purdue Pharma and Sackler Family victims across the United States. Walker challenges the continuing deferral of claims:

THE COURT:

> "So the third point is that this is also true, that you're not giving up any rights in connection with timeliness issues. I know that the timing of claims, late-filed claims they've been described as, **is an issue of importance to a lot of folks. And it's coming up a lot. There's a considerable number of claims where this is an issue.**"

Nov. 13, 2025 Hr'g Tr. 56:1-7.

MR. PREIS:

"As Your Honor has seen since that time, there have been a number of claimants that have filed claims late and have asked for permission to have their claims accepted late. We did accept a number of them right around 2020 and into 2021. And then we stopped and we said, okay, we're going to put all of these off until the end of the case post-confirmation and then we'll start going through the late claims."

Nov. 13, 2025 Hr'g Tr. 46:22-47:4.

THE COURT / Judge Madeline Cox Arleo:

"Because this is something that's going back 20 years. This isn't that, you know, I bought a pair of sneakers that were defective last month and I need to show my receipt. This is 30 years' worth of medical records."

United States v. Purdue Pharma, L.P., Sentencing Tr. 140:21-24 (D.N.J. Apr. 28, 2026).

Judge Arleo then addressed alternatives to unavailable records and instructed Purdue's bankruptcy counsel, Mr. Vonnegut, to convey that concern to the bankruptcy court:

THE COURT / Judge Madeline Cox Arleo:

"And I'm going to remind that to Mr. Vonnegut when he goes back to bankruptcy court, there are states where there are no records, you can't make up records and there's alternatives like affidavits from people and loved ones and other ways -- you know, we're not applying for a Real ID here. We're applying for -- we have to use common sense and care to make sure that the biggest group of people are covered, and that's a message I want you to take back to your bankruptcy court."

Id. at 171:8-15.

MS. KIELIAN:

"Thank you, because the affidavit was removed and that is no longer sufficient."

Id. at 171:17-18.

THE COURT / Judge Madeline Cox Arleo:

> "Well, I'm going to tell you to resubmit it. I'm going to tell him to tell the bankruptcy court that I want there to be some flexibility with victims. And if that means an interview, that means talking to relatives, that means other ways. If records aren't available, they're not available. We don't just say no because records aren't available because doctors don't retain them. So please, use common sense and care and compassion -- think really long and hard before you deny a claim for having inadequate documentation."
>
> Id. at 171:19-172:3.

Judge Arleo acknowledged that she could not oversee bankruptcy claims. Id. at 218:1-6. She nevertheless urged relief for victims to the greatest extent possible. Id. at 219:1-5. Her remarks support evidentiary flexibility and compassionate administration; they did not amend Trust procedures or allow Walker's claim.

Walker challenges the consistency of that process: claim allowance, election consequences, hearings, and appeals continued after the Plan's deadlines and Effective Date. She challenges the absence of a new bar date after Harrington, the new evidence requirements, and the treatment of her Plan vote and separate opt-in or not-opt-in election.

The June 19, 2026 PI Trust Status Report states:

> "The Purdue PI Trust was funded with the initial distribution on the same day and has since been fully funded."
>
> Dkt. 9378, PI Trust Status Report (June 19, 2026).

The Debtors-Appellees state:

> "The roughly $880 million provided by the Debtors-Appellees was disbursed to the various creditor trusts together with approximately $1.1 billion in Sackler payments, and there is no practical way to trace current location of all dollars contributed by the Debtors-Appellees."
>
> Debtors-Appellees' Brief 26.

Walker requests an accounting of receipts, transfers, recipients, balances, and fees, and preservation of successor and trust records. Fed. R. Bankr. P. 2015(a)(2) requires a trustee or debtor in possession to record receipts and disposition of money and property; the appropriate

court must determine its application and any successor or trust accounting duties.

IX. Grounds for Immediate Protection

A stay pending certiorari requires a reasonable probability that four Justices will vote to grant certiorari, a fair prospect that a majority of the Court will reverse the judgment under review, and a likelihood of irreparable injury without a stay. In close cases, the relative harms are balanced.

Hollingsworth v. Perry, 558 U.S. 183, 190 (2010). Walker requests protection under that standard, subject to the separate jurisdictional requirements discussed in Section V.

A. The federal question warrants review under Rule 10(c)

Rule 10(c) identifies important unsettled federal questions and conflicts with this Court's decisions as grounds for certiorari. Harrington expressly left open what qualifies as a consensual nondebtor release. Walker's proposed question is whether such a release may bind a claimant whose alleged coercion and timely attempted revocation were left undecided while the Plan became effective and affected an already-filed state-court lawsuit.

The June 17 dismissal did not decide that federal question. Walker's accounting and nationwide claims concerns provide context; consent, access to review, and preservation remain the principal issues.

B. Immediate protection against continuing harm

Walker identifies the threatened harm as use of a disputed release or injunction against her existing claims before consent review. The September 10 discussion identified possible enforcement, not a new order or fixed enforcement date. See Section VI.A. Compensation would not itself restore an extinguished cause of action.

The agenda for the October 7, 2026 omnibus hearing listed fee applications and insurance-claim objections, but no hearing on Walker's consent or attempted revocation. Dkt. 9632, at 1-4 (filed Oct. 5, 2026).

At the October 7 post-effective omnibus hearing, Walker heard renewed discussion of future hearings. The unofficial working transcription, segments 1-4, describes proposed pro se scheduling and PI matters potentially reaching court in 2027 after Trust review. Walker compares this with deferral since her 2023 filing; it is not a certified quotation or an entered scheduling order.

C. Balance of harms and public interest

Walker submits that the world did not end when Harrington reversed the first confirmed plan; victims instead endured further delay through no fault of their own. Seven years into the bankruptcy, she challenges lawyers' reliance on later process while her earlier requests remain unresolved and Purdue has become KNOA. She seeks present protection, not another promise of future adjudication.

THE COURT / Judge Madeline Cox Arleo:

> **"And to each victim and their families, I apologize. Your government failed you, by not having better accountability and controls and for not stopping Purdue sooner. ... I know it was not your fault. It was the fault of a system that allowed greed to prevail over your health and for that I am so sorry."**
>
> Id. at 214:13-18.

Following the rules of law and enforcing the Constitution and rights must matter. Walker submits that the public interest includes voluntary releases, consistent application of claim standards, and meaningful access to review for injured people who cannot afford counsel.

D. Separate basis for narrowly confined interim protection

Interim injunctive relief under § 1651(a) requires more than the stay standard: critical and exigent circumstances, an indisputably clear legal right, and necessity or appropriateness in aid of this Court's jurisdiction. Ohio Citizens for Responsible Energy, Inc. v. NRC, 479 U.S. 1312, 1313-14 (1986). Walker relies on Harrington, retained Sackler rights, and her documented changed election; national importance or a request for an answer alone does not satisfy the standard.

X. AMENDMENT I PETITION & FREE PRESS & PRESIDENT DONALD J TRUMP

Walker separately preserves her Amendment I right to petition the Government for redress of grievances.

During Walker's scheduled time to speak at the confirmation hearing on November 13, 2025:

MS. WALKER:

> "Good afternoon. I want to start with first amendment, Amendment One, Congress shall make no law respecting an establishment of religion or prohibiting the free exercise thereof or abridging the freedom of speech or of the press or the right of the people peaceably to assemble and to petition the government for redress of grievances. I would also like to read the entire Harrington v. United States --"
>
> Nov. 13, 2025 Hr'g Tr. 100:4-12.

THE COURT / Judge Sean H. Lane:

> "So that I am not going to allow you to do. I don't want that to be -- there is no need to -- but hold on a second, ma'am. Let me see if I can make this a little bit more productive for you and for me and for everybody else here. So you just cited the First Amendment, but you didn't explain how in your view the First Amendment was affected by any of this. So if you cite legal authority, that would be helpful. But I don't need you to read the First Amendment or the Harrington decision. I have read those, you could be sure. So again, I think the idea for making your objection clear is to explain how you think that's affected by this case. Okay?"
>
> Id. at 100:13-25.

MS. WALKER:

"Okay. Well, I feel that my rights have been infringed."

Id. at 101:1-2.

Walker contends communication restrictions, interruptions during her scheduled times to speak, muting, being threatened with having to appear in New York in person from Oregon while being a qualified disabled pro se pauper, and disconnection have violated her Amendment I right to petition the Government for redress of grievances.

Walker states that when she said "I object," she was chastised, while lawyers used "objection."

She understood that she had to answer matters affecting her rights because the Court and Debtors otherwise relied on the absence of a response. Yet Huebner later described a party he said the Court had essentially found a "vexatious litigant" while discussing her Oregon litigation. Sept. 10, 2026 Hr'g Tr. 6:4-7; Section VI.A. Walker contends that this characterization defamed her efforts to protect her rights as a nonlawyer. Ms. Walker can't win for losing. Debtors cannot have it all ways. Where in Amendment I is there a limit on petitioning the Government for redress of grievances?

Walker contends that convicted felon Donald J. Trump, by infringing on a free press, has violated his oath of office to preserve, protect, and defend the United States Constitution and has violated his Article II, § 3 duty to "take Care that the Laws be faithfully executed," and must be removed from office immediately.

Walker contends that constitutional rights must not be merely theoretical; constitutional rights must be practiced and capable of being exercised, or the U.S. Constitution is moot.

NO JUDGE LAWYER SACKLER THE PRESIDENT OR GOVERNMENT ARE ABOVE THE LAW

XI. Relief Requested

Ms. Walker respectfully requests:

1. An immediate administrative stay, followed by a stay pending certiorari, preserving the matters presented through her Oregon proceedings. Within this Court's authority, prevent enforcement that would defeat meaningful review of her disputed release election and related claims.

2. Protect both her Purdue claim and her Sackler Family claims. Prevent respondents from using her disputed election, attempted revocation, or challenged claim disallowance to extinguish those claims or treat pursuit of either as abandonment, waiver, or release of the other.

3. Preserve Purdue PI Claim No. 634787 in In re Purdue Pharma L.P., No. 19-23649 (Bankr. S.D.N.Y.), including her requested allowance, correct tier determination, compensation, and challenges to confirmation and disallowance. Preserve her related review rights in SDNY Nos. 7:25-cv-09681-NSR and 1:26-cv-03711-AS, and Second Circuit No. 26-1235, including reconsideration and en banc requests.

4. Preserve her requested Purdue Pharma PI Trust administrative appeal and special-master review, which she argues she is entitled to pursue after completing the Trust procedure and receiving a Tier 2 evidence assessment. Preserve her requested hearing and challenge to the $500 appeal fee. Temporarily prevent nonpayment from defeating otherwise available review before her fee-waiver or fee-removal request is decided.

5. Protect her Oregon claims against Purdue Pharma and the Sackler Family, No. 23CV33935, including review of the corrected caption and service records and determination of her Sackler Family default request by the appropriate court. Preserve her asserted creditor rights in the Estate of Beverly Sackler, Greenwich Probate Court, Connecticut, No. 19-00460.

6. Preserve and provide meaningful access to the records necessary for review, including transcripts, ballots, revocation submissions, claim evidence, Trust communications, corrected-service records, and relevant financial records. Consider her pending PACER fee-waiver and disability-accommodation requests.

7. Provide a prompt written disposition addressing each request individually and identifying the protections granted or denied and their effect on each proceeding. Consider her requests for disability accommodations, legal assistance, and an opportunity to respond and be heard, including oral argument if permitted.

Ms. Walker expressly reserves all her rights.

Separate broader proposal: Ms. Walker proposes acceptance of all valid Purdue PI claims bearing claim numbers issued through May 1, 2026, to end recurring late-claim proceedings and continuing delay. This proposal does not replace or condition her immediate request for protection of both her Purdue and Sackler Family claims.

XII. Conclusion

Justice Kagan, Ms. Walker requests an immediate emergency stay protecting both her Purdue claim and her claims against the Sackler Family while the connected issues receive meaningful judicial review. Her Purdue compensation, Trust appeal, federal appeals, Oregon action, and Beverly Sackler estate creditor rights must not be lost between proceedings.

If the Plan may change from time to time, fairness must be reciprocal: claimants must have a meaningful opportunity to change their elections and enforce their rights. Ms. Walker asks this Court to address her unresolved consent and revocation issues, challenged claim disallowance, corrected service records, filing restrictions, and reliance on the Court's and counsel's on-record words.

The government, law firms, and courts will continue long after the victims. **Our remaining living time is of the essence.** Ms. Walker asks for protection now, while review and relief can still matter.

The Constitution must matter. Facts must matter. The record must matter. Rights must matter.

Ms. Walker expressly reserves all her rights.

Ms. Walker has used AI to review transcripts and documents. AI is the only assistance she has with writing complex legal documents. She relies on the hearing transcripts and case documents. Ms. Walker is not a lawyer and does not understand case law as lawyers do. She understands what she was told and her constitutional rights. She contends that courts should not punish, chastise & defame disabled pro se paupers for not understanding the law.

NO JUDGES LAWYERS SACKLERS GOVERNMENT OR THE PRESIDENT ARE ABOVE THE LAW.

Respectfully submitted,

Rosemary Helen Ziziros Walker

QUALIFIED DISABLED PRO SE PAUPER

Dated: October 17, 2026

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IN THE COURT OF APPEALS OF THE STATE OF OREGON

Rosemary Helen Ziziros Walker,
Plaintiff-Appellant,

v.

Purdue Pharmaceuticals and The Sackler Family,
Defendants-Respondents.

Marion County Circuit Court No. 23CV33935

Oregon Court of Appeals No. A190941

ORDER OF DISMISSAL

On May 16, 2026, appellant filed a notice of appeal from the denial of a proposed general judgment. That denial is not subject to appeal under ORS 19.205. The appeal is dismissed on the ground that the Court of Appeals lacks jurisdiction to hear the appeal.

Appeal dismissed.

Regardless of the dismissal, the payment of the $391.00 filing fee, or an application for waiver or deferral of fees remains due. If the filing fee is not paid prior to issuance of the appellate judgment, the Appellate Court Administrator will include in the appellate judgment a money award for the amount of the unpaid fees. ORAP 1.20(4); *see also* ORS 21.682 (court may waive or defer appellate court fees if it finds party is unable to pay court fees).

Theresa Kidd
Appellate Commissioner
06/17/2026

DESIGNATION OF PREVAILING PARTY AND AWARD OF COSTS

Prevailing party: Respondent. No costs allowed.

ORDER OF DISMISSAL

Appellate Court Administrator, Appellate Court Records Section
1163 State Street, Salem, Oregon 97301-2563

c: Rosemary Helen Ziziros Walker
Purdue Pharmaceuticals

ORDER OF DISMISSAL

Appellate Court Administrator, Appellate Court Records Section
1163 State Street, Salem, Oregon 97301-2563

IN THE SUPREME COURT OF THE STATE OF OREGON

Rosemary Helen Ziziros Walker,
Plaintiff-Appellant,
Petitioner on Review,

v.

Purdue Pharmaceuticals and The Sackler Family,
Defendants-Respondents,
Respondents on Review.

Oregon Court of Appeals
A190941

S073172

ORDER DENYING REVIEW AND DENYING MOTION FOR LIMITED REMAND

Upon consideration by the court.

The court has considered the petition for review and orders that it be denied. The motion for limited remand is denied.

Meagan A. Flynn
Chief Justice, Supreme Court
September 10, 2026

Bushong, J., not participating.

c: Rosemary Helen Ziziros Walker
Purdue Pharmaceuticals
The Sackler Family

IN THE SUPREME COURT OF THE STATE OF OREGON

Rosemary Helen Ziziros Walker,
Plaintiff-Appellant,
Petitioner on Review,

v.

Purdue Pharmaceuticals and The Sackler Family,
Defendants-Respondents,
Respondents on Review.

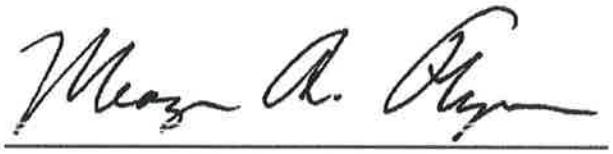
Oregon Court of Appeals
A190941

S073172

ORDER DENYING PETITION FOR RECONSIDERATION

Upon consideration by the court.

The court has considered the petition for reconsideration and orders that it be denied.



Meagan A. Flynn
Chief Justice, Supreme Court
September 29, 2026

Bushong, J., not participating.

c: Rosemary Helen Ziziros Walker
Purdue Pharmaceuticals
The Sackler Family

IN THE SUPREME COURT OF THE STATE OF OREGON

Rosemary Helen Ziziros Walker,
Plaintiff-Appellant,
Petitioner on Review,

v.

Purdue Pharmaceuticals and The Sackler Family,
Defendants-Respondents,
Respondents on Review.

Oregon Court of Appeals
A190941

S073172

ORDER DENYING MOTION TO STAY AND FOR AN EXPEDITED WRITTEN DISPOSITION AND DENYING ADDITIONAL REQUESTS FOR RELIEF

Upon consideration by the court.

The motion to stay pending petition for writ of certiorari and for an expedited written disposition is denied. The requests for relief in the supplemental notice filed September 21, 2026, are denied.

Meagan A Flynn
Chief Justice
September 29, 2026

Bushong, J., not participating.

c: Rosemary Helen Ziziros Walker
Purdue Pharmaceuticals
The Sackler Family

ORDER DENYING MOTION TO STAY AND FOR AN EXPEDITED WRITTEN DISPOSITION AND DENYING ADDITIONAL REQUESTS FOR RELIEF

IN THE SUPREME COURT OF THE STATE OF OREGON

ROSEMARY HELEN ZIZIROS WALKER,
Plaintiff-Appellant, Petitioner on Review,

v.

PURDUE PHARMACEUTICALS AND THE SACKLER FAMILY,
Defendants-Respondents, Respondents on Review.

Oregon Court of Appeals No. A190941
Oregon Supreme Court No. S073172
Marion County Circuit Court No. 23CV33935

EMERGENCY MOTION FOR IMMEDIATE STAY PENDING PETITION FOR WRIT OF CERTIORARI AND REQUEST FOR EXPEDITED WRITTEN DISPOSITION

Petitioner **ROSEMARY HELEN ZIZIROS WALKER, Pro Se, QUALIFIED DISABLED PRO SE PAUPER**, respectfully requests an **IMMEDIATE STAY** preserving all of her existing Oregon claims, state and federal rights, and rights of appellate and United States Supreme Court review pending this Court's written disposition and Walker's timely pursuit of review in the Supreme Court of the United States.

Walker further requests **immediate preservation of all of her existing state and federal rights, claims, causes of action, objections, defenses, remedies, and rights of appellate and Supreme Court review pending this Court's written disposition**, so that none of Walker's rights are further irreparably harmed, extinguished, released, waived, forfeited, mooted, or otherwise prejudiced while this Emergency Motion remains before the Court.

I. THIS EMERGENCY MOTION IS FILED IN DIRECT RESPONSE TO THE SUPREME COURT OF THE UNITED STATES

On September 17, 2026, the Clerk of the Supreme Court of the United States returned Walker's Application for Stay for failure to establish compliance with Supreme Court Rule 23.3.

The Clerk specifically instructed Walker:

> "You must first seek the same relief at the Oregon Supreme Court."

The Clerk further instructed:

> "If you have already sought the same relief before the Oregon Supreme Court, please include your brief/motion there in your appendix to this Court."

Walker is therefore immediately seeking the same stay relief from the **Oregon Supreme Court**, exactly as instructed by the Clerk of the Supreme Court of the United States.

Supreme Court Rule 23.3 provides that, except in the most extraordinary circumstances, an application for a stay will not be entertained unless the relief requested was first sought in the

appropriate court or courts below or from a judge or judges thereof.

Walker requests a written disposition so that she may provide this Emergency Motion and the resulting Oregon order to the Supreme Court of the United States.

II. OREGON PROCEEDINGS

Walker's underlying Oregon action is **Marion County Circuit Court No. 23CV33935**, against **Purdue Pharmaceuticals and the Sackler Family**.

The Oregon appellate proceedings include **Oregon Court of Appeals No. A190941** and **Oregon Supreme Court No. S073172**.

On September 10, 2026, this Court entered its **Order Denying Review and Denying Motion for Limited Remand**, stating:

> "The court has considered the petition for review and orders that it be denied. The motion for limited remand is denied."

Walker thereafter filed in person with this Court her **Petition for Reconsideration on September 10, 2026**.

Walker requests a specific written disposition identifying exactly what has been **GRANTED, DENIED, or remains unresolved** concerning her Petition for Reconsideration.

III. IMMEDIATE STAY IS NECESSARY TO PREVENT FURTHER IRREPARABLE HARM

Walker intends to seek review in the Supreme Court of the United States concerning substantial federal questions affecting her existing Oregon claims, including questions concerning third-party releases, consent, revocation, due process, and the effect of *Harrington v. Purdue Pharma L.P.*, 603 U.S. 204 (2024), upon Walker's existing claims against nondebtor Sacklers.

Walker's Oregon action existed before the later Purdue Plan release election.

Walker respectfully submits that her intended Petition for Writ of Certiorari presents a **substantial question** and that **good cause exists for an immediate stay and preservation of the status quo**.

Without immediate preservation, a judgment, release, injunction, Plan provision, claim-administration determination, transfer, distribution, or related action could be asserted or applied against Walker in a manner that extinguishes, releases, enjoins, moots, materially alters, or otherwise irreparably prejudices her existing Oregon claims, state and federal rights, or ability to obtain meaningful Supreme Court review.

Walker therefore requests an **IMMEDIATE STAY** preserving her existing claims and rights while this Court considers this Emergency Motion and, if granted, through Walker's timely pursuit and disposition of review in the Supreme Court of the United States.

IV. WALKER FILES HERE TO COMPLY WITH THE U.S. SUPREME COURT CLERK'S EXPRESS DIRECTION AND PRESERVES ALL PROCEDURAL POSITIONS

Walker recognizes that ORAP 14.10(2)(a) states that, when the Oregon Supreme Court has denied review of a Court of Appeals decision, a motion under ORAP 14.10 is addressed to and acted upon by the Court of Appeals. Walker nevertheless files this Emergency Motion in the Oregon Supreme Court because the Clerk of the Supreme Court of the United States expressly directed Walker on September 17, 2026: **"You must first seek the same relief at the Oregon Supreme Court."**

Nothing in this filing concedes that Walker did not previously seek the same or equivalent stay or preservation relief in Oregon Court of Appeals No. A190941, and nothing in this filing waives any prior request for stay or preservation relief in any Oregon court.

If this Court concludes that ORAP 14.10(2)(a) requires the requested stay to be acted upon by the Court of Appeals, Walker respectfully requests an immediate written order stating that determination and identifying the required court and procedure, without prejudice to Walker's prior filings, claims, rights, or preservation requests. Walker requests that the procedural interaction between the Clerk's express Rule 23.3 instruction and ORAP 14.10 not operate to forfeit, waive, moot, or otherwise prejudice her right to seek United States Supreme Court review.

V. WALKER REQUESTS A SPECIFIC WRITTEN DISPOSITION

Walker has pursued relief through the Oregon appellate process and is now complying with the September 17, 2026 instruction of the Clerk of the Supreme Court of the United States. Walker respectfully requests that this Court enter a written order expressly stating:

1. Whether Walker's requested Emergency Stay is GRANTED or DENIED.

2. What has been GRANTED, DENIED, or remains unresolved concerning Walker's September 10, 2026 Petition for Reconsideration.

3. What, if anything, the Oregon Supreme Court requires Walker to do next. If any additional Oregon filing, motion, proceeding, remedy, or procedural step remains necessary, Walker requests that this Court identify specifically what Walker must do and in which court she must do it.

4. Whether Walker has completed the Oregon proceedings required before seeking review in the Supreme Court of the United States - YES or NO. If NO, Walker requests that this Court identify specifically what remains to be done and where Walker must do it.

5. If no additional Oregon proceeding remains, whether Walker's next avenue of judicial review is a Petition for Writ of Certiorari to the Supreme Court of the United States - YES or NO. If NO, Walker requests that this Court identify specifically what judicial proceeding or remedy remains available and where Walker must pursue it.

Walker requests these determinations so that she is not required to duplicate relief already sought, file in an incorrect court, or risk further irreparable prejudice while attempting to preserve her right to Supreme Court review.

VI. EXPRESS RESERVATION AND PRESERVATION OF ALL RIGHTS

Walker expressly reserves **all rights, claims, causes of action, objections, defenses, remedies, constitutional rights, statutory rights, procedural rights, appellate rights, rights concerning consent and revocation, rights to seek a stay, rights concerning reconsideration, rights to seek**

review in the Supreme Court of the United States, and every other right and remedy available to her under Oregon and federal law.

This reservation includes all rights relating to **Marion County Circuit Court No. 23CV33935, Oregon Court of Appeals No. A190941, Oregon Supreme Court No. S073172, Purdue Pharmaceuticals, the Sackler Family, Walker's existing Oregon claims, and any asserted third-party release, injunction, Plan provision, claim determination, or related proceeding.**

Pending this Court's written disposition of this Emergency Motion, Walker requests immediate preservation of the status quo and all of her existing rights and claims so that no judgment, release, injunction, Plan provision, claim-administration determination, transfer, distribution, or related action is enforced or applied against Walker in a manner that would extinguish, release, enjoin, moot, materially alter, waive, forfeit, or otherwise irreparably prejudice her existing Oregon claims, constitutional rights, state or federal rights, appellate rights, or ability to obtain meaningful Supreme Court review.

Nothing in this Emergency Motion, Walker's prior filings, her requests for clarification, her pursuit of appellate remedies, or her compliance with the September 17, 2026 instruction of the Clerk of the Supreme Court of the United States constitutes or shall be construed as **consent, waiver, release, abandonment, forfeiture, acquiescence, or concession** of any claim, cause of action, right, objection, defense, argument, remedy, or avenue of review.

Walker specifically **does not concede** that any asserted third-party release binds her; that her existing Oregon claims against the Sackler Family have been extinguished; that Walker presently consents to any release asserted against those claims; that any disputed issue concerning her claim, consent, release, revocation, due process, constitutional rights, or jurisdiction has been finally adjudicated; or that any matter not expressly addressed in this Emergency Motion has been waived.

Walker expressly requests that **all of her existing rights, claims, objections, defenses, remedies, and avenues of review be preserved pending this Court's written response** so that those rights are not further irreparably harmed while Walker awaits the Court's disposition.

This Emergency Motion seeks immediate preservation and a written disposition. **Walker expressly reserves every right and remedy otherwise available to her under Oregon and federal law.**

VII. EXPEDITED RELIEF REQUESTED

Because Walker's application to the Supreme Court of the United States has already been returned awaiting compliance with Supreme Court Rule 23.3, additional delay risks further irreparable prejudice to the rights for which Walker seeks preservation.

Walker therefore respectfully requests that this Court, **within seven (7) days**, enter a written order:

1. GRANTING an immediate stay and preserving the status quo so that Walker's existing Oregon claims, constitutional rights, state and federal rights, appellate rights, and right to meaningful Supreme Court review are not further irreparably prejudiced;

2. GRANTING or DENYING Walker's requested stay pending her timely pursuit and disposition of a Petition for Writ of Certiorari;

3. Identifying specifically what has been GRANTED, DENIED, or remains unresolved concerning Walker's September 10, 2026 Petition for Reconsideration;

4. Stating specifically what, if anything, the Oregon Supreme Court requires Walker to do next;

5. If additional Oregon action is required, identifying the specific proceeding and the court in which Walker must pursue it;

6. Answering YES or NO whether Walker has completed the Oregon proceedings required before seeking review in the Supreme Court of the United States;

7. If no additional Oregon proceeding remains, answering YES or NO whether Walker's next avenue of judicial review is a Petition for Writ of Certiorari to the Supreme Court of the United States; and

8. Entering a sufficiently specific written order that Walker may provide this Emergency Motion and the resulting order to the Supreme Court of the United States in compliance with Supreme Court Rule 23.3.

VIII. CONCLUSION

Walker has immediately complied with the September 17, 2026 instruction of the Clerk of the Supreme Court of the United States by seeking the same emergency stay relief from the **Oregon Supreme Court**.

Walker respectfully requests an **IMMEDIATE STAY** preserving all of her existing Oregon claims, state and federal rights, constitutional rights, appellate rights, remedies, and right to meaningful Supreme Court review from further irreparable harm.

Walker further requests a specific written disposition stating **exactly what, if anything, this Court requires Walker to do next**.

Walker requests, to the extent within this Court's authority, that no action occurring while this Emergency Motion awaits disposition be permitted to defeat, moot, extinguish, release, waive, forfeit, materially alter, or otherwise irreparably prejudice the rights for which Walker presently seeks preservation.

ALL RELIEF REQUESTED HEREIN IS WITHOUT WAIVER OF, AND WITH EXPRESS RESERVATION OF, ALL OF WALKER'S EXISTING STATE AND FEDERAL RIGHTS, CLAIMS, CAUSES OF ACTION, OBJECTIONS, DEFENSES, REMEDIES, AND RIGHTS OF APPELLATE AND UNITED STATES SUPREME COURT REVIEW.

JUSTICE DELAYED IS JUSTICE DENIED.

Walker further respectfully submits that constitutional and statutory rights cannot exist merely in theory:

RIGHTS CANNOT BE A THEORY. RIGHTS MUST BE PRACTICED.

DATED: September 18, 2026.

Respectfully submitted,

ROSEMARY HELEN ZIZIROS WALKER
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voice.

THE COURT: Do me a favor and get as close to that microphone as you can. I recognize you are suffering some medical things that make it hard to speak up.

MR. PREIS: Thank you. For those in the room, I don't have COVID. Okay?

MR. HUEBNER: He may have other things, just for the record.

MR. PREIS: So back in 2020, the Debtors, along with the Committee worked on a pretty substantive, very extensive noticing program for victims to be alerted to the fact that there would be an opportunity to file a proof of claim form. And that program lasted six months. There was television -- this obviously predated Your Honor. There were television commercials, there was a number of advertisements through websites, through Facebook. More than the normal channels. I think the total cost of the program was somewhere in the $15 to $20 million range. It was designed to be as extensive as possible. The result of that program is that about 140,000 personal injury victims submitted proofs of claim in June of -- by June of 2020.

As Your Honor has seen since that time, there have been a number of claimants that have filed claims late and have asked for permission to have their claims accepted late. We did accept a number of them right around 2020 and

into 2021. And then we stopped and we said, okay, we're going to put all of these off until the end of the case post-confirmation and then we'll start going through the late claims.

Fast-forward now to 2025. As part of Mr. Gentle's process of determining and administering the claims -- again, Mr. Gentle was the PI trustee -- we worked out with the Debtors a methodology whereby we would send out supplemental claim forms to all the 140,000 people who sent in their information to give them another opportunity to supplement their forms in the chance that or on the off chance that they have more information than they would have sent in in 2020. That process in the normal course would be done post effective date. In the normal course a trustee like Mr. Gentle will go through the proof of claim forms and then he'll give everybody an opportunity to send in additional information once he has a trust. Here, in order to expedite distributions, the idea was, okay, let's expedite the process of getting Mr. Gentle all the information he needs.

So around I think it was May or so a supplemental notice was sent out to the 140,000 people who sent in proofs of claim, and they were given until the end of July to send in any additional information they had. If they felt that they already sent in their information five years ago, they

So the third point is that this is also true, that you're not giving up any rights in connection with timeliness issues. I know that the timing of claims, late-filed claims they've been described as, is an issue of importance to a lot of folks. And it's coming up a lot. There's a considerable number of claims where this is an issue.

What's been explained before is that the idea is to get to confirmation, to know that we have a plan, that we have a way to deal with claims, allowed claims and different classes, before turning to the timeliness issue. One of the reasons for that is to try to deal with these kinds of legal issues as consistently as we can.

And so there will be hearings in the future that deal with the timeliness issues. There have only been one or two one-off situations where timeliness has been requested for me to address. We've already had hearings on those. One of them is I'm working on now. But for most folks, that issue hasn't yet come to the fore if you filed the claim after what is identified as the bar date. That will be addressed. It's not an issue for today. I know that can be frustrating to hear that. You have important issues, but they're not the issues we're dealing with today. But in bankruptcy we have to by necessity sequence issues, particularly in a case as large as this one.

Thompson. Number 18, Rosemary Walker. Ms. Walker?

MS. WALKER: Hi, I am here.

THE COURT: Good afternoon.

MS. WALKER: Good afternoon. I want to start with first amendment, Amendment One, Congress shall make no law respecting an establishment of religion or prohibiting the free exercise thereof or abridging the freedom of speech or of the press or the right of the people peaceably to assemble and to petition the government for redress of grievances.

I would also like to read the entire Harrington v. United States --

THE COURT: So that I am not going to allow you to do. I don't want that to be -- there is no need to -- but hold on a second, ma'am. Let me see if I can make this a little bit more productive for you and for me and for everybody else here. So you just cited the First Amendment, but you didn't explain how in your view the First Amendment was affected by any of this. So if you cite legal authority, that would be helpful. But I don't need you to read the First Amendment or the Harrington decision. I have read those, you could be sure.

So again, I think the idea for making your objection clear is to explain how you think that's affected by this case. Okay?

MS. WALKER: Okay. Well, I feel that my rights have been infringed. Okay. A thousand country miles, 50,000 view. I mean, what does that even mean? I feel that many of the pro ses have brought up being accountable, and I feel there was an amendment about the board and how the public benefit is going to work that all of us pro se litigants should be allowed to be part of the board, of the Knoa Board. Yesterday they brought this up public -- and about Knoa, that it was in the best interest. And then they went on about the last Sackler resigning. But I feel that that's a really good way for us to participate by being part of the board.

Were the issues about the rider with Richard Sackler resolved? That was also brought up yesterday. And if they are not resolved, then that is a reason for this not to go through.

Then I could not find the word emergent, like, anywhere in the bankruptcy code. What is emergent versus discharge versus if -- you know, again, if money is going to be going out over 15 years --

THE COURT: Well, maybe I can help on that. And I'll make a comment and maybe somebody on the Debtors can help. I think what you've heard most often is the effective date. And that's when certain things are contemplated to happen under the plan happens so that you take the steps

that are contemplated by the plan. And so that's what's generally used, the effective date. It has a very technical --

MAN 1: Hello?

THE COURT: Okay. Somebody has got an open line, and that needs to be muted. We can only hear from one person on Zoom at a time. Thank you very much. And so just -- you mentioned emergence. And I'll try to clarify where I can. I think effective date means that the things that are contemplated by the plan have gone forward in terms of the substantial steps to make the plan move forward. It doesn't mean that everything is done in the case by any stretch of the imagination. But I don't know if that's of any help, but hopefully it is.

MS. WALKER: Well, it just seems that this is nowhere near done. I mean, the whole time yesterday -- oh, holdbacks. What is a holdback? Oh, everyone keeps mentioning opt-in or opt-out. However, until -- they brought up claims for this whole thing. And it's part of the plan. So it kind of should be resolved. There's --

THE COURT: Well, it's very clear, ma'am -- and I just finished explaining that. It's very clear that this plan when it comes to your rights against the Sacklers is an opt-in plan.

MS. WALKER: Right. But I can revoke. Because I

opted in and approved the plan. But that doesn't mean that that's going to stay that way if my claim is not approved. Then I'm going to revoke my release of the Sacklers.

And then will we be punished? Because yesterday they were mentioning two years -- like if you don't release, then they can wait up to two years. And why would the Sacklers get paid lawyers' fees for defending what lawsuits will be done against them when -- if we revoke our release. I mean, again, that just doesn't seem like it's really written in, and it should be amended along with --

THE COURT: All right. So let me see if I can get you information on one of those things.

MS. WALKER: Oh, was there a --

THE COURT: Ma'am, if I'm talking, you're not talking.

MS. WALKER: Sorry.

THE COURT: All right. The ability to participate remotely is a privilege. We are doing it in this case because it makes sense. And it's very challenging. So I don't mean to yell at anybody, but it's very, very hard to do this remotely given the number of people on the line, which is numbers -- I think yesterday it was over 170 or whatever it was. It's a large number of people.

So I sense the question that might benefit from clarification from somebody who is in a position to walk

through this. What I understood Ms. Walker to be asking just a minute ago was what happens with her release and her release and her opt-in if her claim isn't allowed.

MS. WALKER: Right.

THE COURT: Yeah. So let me see if I can get somebody here in the courtroom to answer that question. We're all about trying to get information to people if we can. And that seems to be a fair question.

MS. WALKER: And, Judge --

THE COURT: Hold on. Hold on. Ma'am, I'm going to try to get --

MS. WALKER: Okay, sorry. Sorry.

THE COURT: You need to wait. Because I'm going to try to get an answer to your question. But you've got to hang with me for a minute.

MS. WALKER: Okay, sorry.

THE COURT: All right. No worries. No worries.

MR. HUEBNER: So, Your Honor, I will do my best to answer on the fly and I'll look to Mr. Preis and others to help where they can.

So Ms. Walker's situation is one of the few that is relatively unique, although one should never modify the word unique. She filed her claim late and is currently the subject of an adjourned late claim objection. And so possibility number one is that the Court rules that she

THE COURT: I've got to have this orderly or it doesn't work at all.

MS. WALKER: Okay. Sorry.

THE COURT: Okay. Let me finish getting the explanation. So again, hang with me, please. I appreciate your patience.

MS. WALKER: Okay.

MR. HUEBNER: But there is not a mechanic for saying for how I will affirmatively choose to opt into the releases on my ballot, I don't want to sue the Sacklers, I want to get the enhanced distribution. But then if I don't like the outcome with the TDP, I then get to withdraw my opt-in in X months or a year and then have a different set of rights. And so the election I think within the extended window that has been provided does have to be made. And it's irrevocable. You don't get sort of a do-over based on what happens with the trust distribution procedures with your claim with respect to, you know, revoking essentially the affirmative opt-in that you previously gave on your ballot to participate and be a releasing party.

Let me just check with Mr. Preis since I am looking at the Court not sideways. Let the record reflect that Mr. Preis, who knows more about this than I do, nodded his head, which in this country means agreement.

THE COURT: Let me ask -- hold on one second,

what the Supreme Court ruled on. I agree with the other pro se claimants.

THE COURT: All right.

MS. WALKER: All right. Thanks, Judge.

THE COURT: Thank you very much, Ms. Walker, and hopefully we got you some information in the course of today.

MS. WALKER: Well, I would like it in an amendment and so that we do have -- you know, claimants do have the right to revoke release.

THE COURT: All right. All right.

MS. WALKER: Okay.

THE COURT: Thank you very much. So we are now at 12:30. I understand 12:45 is the preferred time, so I'm going to move forward with the next individual. Number 19, Maria Ecke.

MR. RAND: Judge? Judge, James Harry Rand here.

THE COURT: Okay. Mr. Rand, let me hold on a second.

So, Ms. Ecke, we're going to hold off on you for a second.

Mr. Rand, I'm glad you're here. We called you before and I know there could be lots of reasons. Well, whatever. Glad to have you here. So let me turn the virtual podium over to you, Mr. Rand.

MS. WALKER: Okay. Okay.

THE COURT: But I don't.

MS. WALKER: Okay, so you've mentioned that the Trust first goes through the deficiencies, so if Edgar decides that I have a valid claim, then does Edgar's decision count with your decision, or is your decision, your decision comes before Edgar's?

THE COURT: We're getting a little in the weeds here in way that I don't know is helpful, but let me try to tell you what -- maybe this is helpful. All of this is dealt with at the Trust level before it ever comes to the Court, because there's too many, in terms of the quantification of claims and the substantiation of claims, that's what the deficiency notices are for. And if there's an objection to a claim, then, that'll come in front of me, but certainly, I understand that there's been -- that Mr. Edgar has sent out deficiency notices where this additional information that is in the -- his view necessary to process the claims. So Mr. Preis is standing, if he wants to straighten me out, if I've got any of that wrong.

MR. PREIS: Your Honor, you have it right, except what Ms. Walker is focused on is the fact that her claim was filed late.

THE COURT: Yes, and again, we've --

MR. PREIS: And so her question was --

MS. WALKER: Why am I doing it if the bar date is moot?

MR. PREIS: -- is Your Honor going to make a decision before Mr. Gentle or after?

THE COURT: Oh.

MR. PREIS: That's the question. That's what she's asking.

THE COURT: So when I have an issue teed up in front of me for a decision, I will make that as quickly as I can. As a general matter, I think a lot of these things will be with the Trust first, but the late filed claims, I understand that I already have some matters in front of me, and I'll make those decisions as soon as I can. What I can't tell you is if there's something else going on at Mr. Edgar's office or with the Trust where they may be asked for documentation. I don't know the answer to that, so if there's something that's in front of me on a late-filed claim, a motion that's been teed up, then, I'll decide that as soon as I can.

MS. WALKER: Okay, and then, just one last thing, again, so many things were mentioned yesterday by Davis Polk that were unresolved and that were, some of them, were major not minor things. And one was the Richard Sackler writer, whatever that is. Have these things been resolved or not?

THE COURT: Well, that's the subject of ongoing

from where things currently stand to full completion of all remaining credit support and collateral documents that underly the master settlement agreement and the settlement with the Sackler family.

I'm pleased to report that very, very recently, we received confirmation from Dr. Sackler's counsel that he has accepted our most recent proposed writer. I won't burden the Court with a tremendous amount of detail right now, but briefly stated, that provides for a commitment on Dr. Sackler's part to complete and execute the remaining documentation for the settlement, the specific timeline for completion of that documentation, Court supervision of that process, and enforcement mechanism, should we have any difficulty getting from here to completed settlement documentation.

THE COURT: All right.

MR. VONNEGUT: And so what we would propose to do, Your Honor, procedurally, is to file a revised form of order later today that has the agreed language in it. There was an initial version filed on Tuesday with the language in Paragraph 33, but we'll file a new form of order with the final agreed language. And then, we can address any questions that Your Honor may have on that language when we walk through the entirety of the proposed form of confirmation order tomorrow.

it, and we can --

MR. HUEBNER: Exactly.

THE COURT: -- if necessary, read it into the record and then have people confirm it. I just want it to be clear as a bell on the record that that's agreed to. And while I can sign an order, me signing it doesn't mean anybody's agreed to it, I've learned, over the course of 15 years. So but I'll leave it to you to work it out, but that makes -- what you're talking about makes sense to me. So send it. Do me a favor. When you have that paragraph, you circulate it so I know where to find it, and then I'll expect it to be read into the record tomorrow, and it will be confirmed by all parties.

MR. HUEBNER: Your Honor, we would like Ms. Penachio to come off mute and confirm everything we have just said right now so there's no confusion.

THE COURT: Yes, that's fair enough.

Ms. Penachio?

MS. PENACHIO: Yes.

MR. HUEBNER: You're on mute, Ms. Penachio.

THE COURT: I heard you briefly, and then you went on mute.

MS. PENACHIO: I apologize. Your Honor, on behalf of --

THE COURT: I can hear you just fine.

MS. PENACHIO: Thank you. On behalf of Dr. Richard Sackler, I confirm that he is in agreement as to the writer.

THE COURT: All right. All right, thank you very much for the update. I appreciate that, and Ms. Walker had it right in the sense of saying you want as many uncertainties to be addressed as possible, and so I'm happy to have that -- to hear that good news.

MR. VONNEGUT: Thank you very much, Your Honor. That is absolutely our goal. I don't believe the Debtors have anything further for today, Your Honor.

MR. HUEBNER: We do.

MR. VONNEGUT: I am mistaken.

MR. HUEBNER: Your Honor, a few closing comments for today that will be helpful. This will not take very long. Mr. Pinkusov, who has been a caring and devoted participant in this case for a long time, and obviously, travels here in person and participated, which we both respect and appreciate, said something that I think is actually quite telling, which is that if you handed out these documents to people on the street, probably fewer than five percent of them would actually understand them.

And unfortunately, that painful truth is probably unavoidable just as if an architect or an engineer hands out their plans and stress factors for concrete load bearing, or

think Mr. Preis had thrown out 50 percent. I'm not -- obviously that's not knowable and I didn't take that as fact. But I took it as a demonstration that it's not an insignificant number, particularly given the timelines for the opioid use involved in the personal injury claims. And we did have one of the gentlemen yesterday who was on the phone talk about, well, I don't have any records.

MR. VONNEGUT: Yes.

THE COURT: So the question then becomes whether there's any concern about if there's a large percentage of folks who have a claim that's allowed, but it's not really allowed, but they've given up their right to sue the Sacklers and ultimately they get nothing out of it.

MR. VONNEGUT: Yes.

THE COURT: And so what's the response to that? I think that was made -- that point was made --

MR. VONNEGUT: Sure.

THE COURT: It took me awhile to understand why Ms. Walker was so intent on the sequencing of things. And I think that was ultimately her point. How do I know if I want to give this up if I don't know if it actually gets me anything?

MR. VONNEGUT: Yes, Your Honor.

THE COURT: So what's the thinking behind that?

MR. VONNEGUT: Sure. So Ms. Walker specifically

that can happen. So let me be very precise, Your Honor. So as I say, if you grant the release, your claim is deemed allowed. But that allowance is deemed to occur at emergence.

So if you grant the release, if you tick the box on your ballot, your claim is therefore deemed allowed --

THE COURT: So it's more like a provisional allowance than an actual allowance. All right.

MR. VONNEGUT: Correct. Correct. But again, it only occurs at emergence. So if your claim gets disallowed prior to emergence, you're not bound to the release, you're not treated as a claimant in the case.

If you grant the release, your claim is deemed allowed at emergence. You then go to the PI claims trust for processing of your claim and it is possible that the trust distribution procedures on the basis of your specific claim then say you do not get a recovery from the personal injury trust.

However, it's important to note the ballots that everybody signed to opt into the releases, and those are on file for PIs and I believe third-party payors as well, those are on file at 7611 filed June 20th. And I just have the language here.

So what it says is if you grant the release, such holder's claim will be considered allowed and therefore such

THE COURT: All right. So before we start the closings, let me ask if there's anything else in the nature of sort of cleanup, hanging chads, before we get to closings. And then I'll turn to the folks on the phone and ask the same question. I don't see anybody here in the courtroom asking -- raising any issues that need to be addressed.

So, Ms. Walker, you had a question?

MS. WALKER: I just want to say for the record from yesterday, there's no such thing as emergence in the Bankruptcy Code. We used the correct --

THE COURT: I know, but I heard that argument yesterday. I understand. I think what we're trying to do is get you practical answers to some of your concerns. So I think what -- here what I think is most relevant to your question, which is a very legitimate question. I thought long and hard about it yesterday.

MS. WALKER: I appreciate that.

THE COURT: And I appreciate Mr. Vonnegut's clarification. There's a deadline to make this decision. You've already done it because you filled out a ballot. But there is -- in your situation, the timeliness of your claim is going to be addressed before what is being referred to as emergence or the effective date. And that means if it is for some reason disallowed, you will not have given any

release. And if it is allowed, then the release and your compensation will track. Okay?

MS. WALKER: Okay.

THE COURT: Does that help to clarify things?

MS. WALKER: Yes. I just felt like the sentence, the Sacklers emergence from their fraudulent wires and milking schemes with a new company are, like, Scott free. I just don't like the word. (indiscernible). That's all.

THE COURT: Yeah, well, I know. It's a word that's used as a synonym for other words. You've heard emergence, effective date.

MS. WALKER: Well, it complicates it for people who don't understand bankruptcy law. And we're trying to read things, and that word is not -- words like --

THE COURT: I understand that.

MS. WALKER: Okay. I appreciate it.

THE COURT: I will tell you the shocking news that I hear a lot of lingo that's not in the Bankruptcy Code.

MS. WALKER: I know.

THE COURT: The Bankruptcy Code has been around for a little while. So I get it. The important thing is that you know what it means for you and how it affects your circumstance. And that's what I wanted to make sure we had clarity on.

MS. WALKER: No, I appreciate it. And I don't

MR. HUEBNER: Thank you, Your Honor.

(Recess)

THE COURT: So we are going to start with the other five folks. But first once more into the breach and to beat a dead horse, both of those phrases are applicable here. We had a discussion about Ms. Walker's issue. And I will say she's got a pretty good grasp of the Bankruptcy Code for somebody who isn't a bankruptcy lawyer. She mentioned issues about effective date and emergence. And I think Mr. Vonnegut and I had a discussion about it and I think generally I understand -- well, I think I understand everything he said. It was very helpful. And just in an abundance of caution, my understanding is we have three sort of dates that we're talking about here. We have the date of March 1st for people to submit the opt-outs. Great. Nice, clean, clear unambiguous date. Then we have the effective date, which requires certain things and transactions to be accomplished.

And then we've been using the term emergence. And so the understanding is that to the extent that there are any issues when talking about allowed claims -- and I think what we're really talking about is conditionally allowed, going to the trust, that is it the effective date or the emergence date that is the date where that if somebody's opt-in is final and your claim would be disallowed such that

you would be -- that your release would follow your claim.

MR. VONNEGUT: Yes. Sorry, Your Honor. The effective date and the emergence date are functionally the same date.

THE COURT: Functionally the same.

MR. VONNEGUT: Yeah. That's how we use those terms.

THE COURT: All right. I just wanted to make sure. Because again, Ms. Walker did correctly say it's a colloquial term.

MR. VONNEGUT: Yes.

THE COURT: And I've heard it used on occasion to mean it's the discharge, it's everything is done, money is out. And this is an enormous case, so I just wanted to be very clear on that.

MR. HUEBNER: Your Honor, two quick things. One, I want to apologize. I clearly did a bad job trying to explain this yesterday, because that was the conversation that I was trying to help you with about substantial consummation, which is actually the technical term in 1101 and 1127, which are in fact the same thing as the emergence date and the effective date.

But one thing I want to be super clear about -- and Mr. Vonnegut will definitely keep me honest here -- the issue of I have a late claim, I submitted a ballot in which

I indicated that I wanted to participate in the settlement and therefore released the Sacklers, my claim is thereafter barred as late, your ballot is voided. And so you do not run that Catch-22 trap of I may well have a phenomenal claim, I was just late, but now I can't sue anybody. So again, with kudos to Ms. Walker, that was a very, very reasonable question. And a bunch of us had -- others, because other people knew the answer -- had to go look at it to triple check. That obviously is different than what Your Honor talked about, which is to the extent that somebody elects to participate and ultimately in the TDP they are found not to have a meritorious claim, there they are not allowed to say, well then wait, now I want to go back. And as Your Honor pointed out and we certainly agree, one of the reasons everyone agreed to it is if your claim isn't even meritorious against the company among many other things, the notion that you nonetheless have a valid claim against the company's officers, directors or owners is an extremely attenuated proposition to say the least. And at the end of the day what people opted for was the opportunity to have a higher distribution should their claim be allowed. But if their claim is not allowed on the merits because they can't prove it up, then the consequences are what they are.

And so the March 1 date finally is not sort of like a global new election date, it's if anybody wants to

make the determination to change the election on their ballot they already made. There's not going to be some new solicitation.

THE COURT: Right.

MR. HUEBNER: We'll accept notices from someone saying hey, you know, now that I understand things better, I previously opted either in or not opted in, I would like to change that. So it's a last chance to change what we already did. It's not a whole new process for giving people a new election deadline.

THE COURT: All right. And I think it's important to point out when talking about meritorious claim, people who are not bankruptcy, people think meritorious, think trial, think evidence, ultimate conclusion. That's not what that term means here. There's a standard set forth in the plan that is purposefully low so as to avoid having extensive time and money spent.

So the idea here is to satisfy the "meritorious claim" standard, the standard is exceedingly low. It is evidence that you took the drugs in question, period, full stop. There's other information that could be helpful in terms of figuring out exactly how your claim should be treated, but that is what if you check the opt-out you want to receive -- I'm sorry, the opt-in and you want to receive the recovery from the Sacklers and you have a meritorious

So I just think that's worth repeating because no one is going to sit there and say, well, let's look at your quantum of proof. Well, what are your dates and what did your doctor say and what exactly what was your dosage? That's -- we're not doing that kind of granular if you were to sue Sacklers in state or federal court, call your first witness, this is what you need to prove.

MR. HUEBNER: Correct.

THE COURT: It's markedly different than that.

MR. HUEBNER: And Your Honor, equally importantly, this was certainly not a provision that was a debtor-focused thing. Because it's not like the Debtors, god forbid, get back the money if somebody's claim is stricken. The PI pool is the PI pool.

THE COURT: Right.

MR. HUEBNER: And that money is available and that category of victims will get all of it as set forth with the complexities of the plan.

THE COURT: One way or the other. Yeah, that's correct.

MR. HUEBNER: Exactly.

THE COURT: All right. Thank you. And again, I appreciate it. I know we've been peeling the layers of this back. I think it's worthwhile. It's an important issue. And so I just want it to be very clear. And I appreciate

the education.

And so Mr. Walker's question spurred some very useful information on the record.

MR. HUEBNER: And a new fixed deadline.

THE COURT: And a new fixed deadline.

MR. HUEBNER: So she changed the plan. I think Mr. Eckstein from Kramer Levin is up next, Your Honor.

THE COURT: So we are going to resume again -- to Ms. Ecke's point earlier, the idea is to hear from everyone. There's people I have not heard yet from in terms of their position on the plan. And that's what the remainder of the day is, to hear from the folks I have not yet heard from. And I understand there are five groups. And with that, Mr. Eckstein, the floor is yours.

MR. ECKSTEIN: Good morning, Your Honor. Kenneth Eckstein of HSF Kramer on behalf of the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants. I am going to speak and be followed by Umair Khan from the New York State Attorney General's Office.

Your Honor, the Ad Hoc Committee is appearing today to voice its support for confirmation of the plan and implementation of the settlement contemplated thereunder. The AHC has filed a memorandum of law in support of confirmation and Your Honor has just heard a comprehensive presentation by Mr. Huebner on behalf of the Debtors as to

the Ad Hoc Group, wholeheartedly support this settlement. I start by looking at the 50,000 foot view, since we now can use that term, of litigation and reality. Yes, some Sacklers are bad people. But the reality is that sometimes bad people win in litigation.

Yes, the Purdue Corporation did horrible wrongs. But the reality is that corporate officers and directors and shareholders rarely get held liable for their employer's acts.

Yes, the Sacklers looted the corporation. But fraudulently conveying suits are damn hard to win, especially old ones. And yes, sometimes people get massive judgments. But the reality is that it takes time and money and collection efforts that sometimes fail.

For all of those who support a narrative that the Sacklers were there for the taking, I'd say from your lips to God's ears. In short, coming from someone who has done this for 33 years, there is no costless, riskless, easy button in litigation. Personally, I would have loved to litigate with the Sacklers, but this deal is better. Is it perfect? No, but it is a better, fantastic, groundbreaking settlement for personal injury victims.

And in order to fully appreciate that statement, the true narrative, one needs to read and digest the record. What came in through the witnesses who got on and off the

order. And although we are in federal court and we use legal jargon to talk about settlements and money, at the end of the day, all this plan can do is address the Purdue bankruptcy in a manner that the Purdue Creditors want to.

There are bigger issues, like whether the Sacklers should be criminally prosecuted, how the states should use the money they receive in this plan and other settlements. Should the laws about moving money abroad be modified to protect against what the Sacklers did? And should the federal government be forced to use the Sackler money (indiscernible) abatement?

All of these questions are things we have and we encourage people to write their governments, write the state and federal governments that represent them. But none of them are things that this case is designed to address. The Debtors have gone through why the plan meets the requirements in the Bankruptcy Code. I'm now going to move to my second topic, the Sackler settlement.

There's been a lot said to us, the Committee in particular, about the overall settlement the Sacklers are paying to settle the claims against them. $6 and a half billion over 15 years, plus Purdue's $900 billion -- million, roughly $7.4 billion.

The question we get continually is why. Why only $6 and a half billion from the Sacklers? Why not more? Why

did we leave the Sacklers with potentially billions? Let's start with this. The only claims the Committee could actually take part in settling were the estate claims -- not the direct claims that individual Claimants may hold against the Sacklers. Specifically, as has been talked about, these are things like fraudulent transfer, breach of fiduciary duty and unjust enrichment.

These claims deal with money, about $11 billion, that the Committee believes the Sacklers wrongfully took out of Purdue between 2008 and 2017. So after doing what was often described as one of the most extensive investigations ever in the history of bankruptcy, why would we settle for a dollar less than $11 billion?

First, let's be clear about one fact. Of that $11 billion, about $3 and a half to $4 billion of it was used to pay taxes. Said another way, the Sacklers only pocketed $7 billion of it. Well, of course it's reasonable to assume that the Sacklers invested it and made money on it since then, and of course, that's part of the litigation, there's a companion question that people have asked quite a bit.

Why did the $4 billion that the federal government get was used -- why wasn't that used for a victim compensation and opioid abatement, as it was Purdue money? Again, not for this Court, it's things that we've encouraged people to ask the federal government.

THE COURT: Good morning.

MS. WALKER: Thank you. Good morning. Can I speak yet, or (indiscernible)

THE COURT: No. Ms. Walker, I have -- The confirmation is fully submitted. The only thing that we --

MS. WALKER: Okay. I filed an appeal and the stay and (indiscernible)

THE COURT: Ma'am -- ma'am -- ma'am, ma'am, ma'am -- ma'am, I haven't even made a ruling or entered an order. So the appeal comes after that. So I need to make a ruling, so first things first. We've got to --

MS. WALKER: But I'm requesting (indiscernible)

THE COURT: Okay, ma'am, I'm not -- ma'am, I am not here to have you hijack today's proceeding, so you need to listen to what I'm telling you. There --

MS. WALKER: Okay. Okay.

THE COURT: Again, I have got to make a ruling, I've got to enter an order.

MS. WALKER: Okay.

THE COURT: You are obviously free to appeal. That's perfectly fine. But that's not an issue to discuss on the record today. You're free to take whatever steps --

MS. WALKER: Well, the stay -- a stay is, so that everything is held right where it is when I applied for the appeal and the stay.

THE COURT: Okay. Well again, I haven't made a ruling yet. So again, I can't give you legal advice, so first things first --

MS. WALKER: All (indiscernible) request that (indiscernible)

THE COURT: Could someone please mute Ms. Walker?

MS. WALKER: So have you confirmed then --

THE COURT: Ms. Walker, if you were listening, I have not made a ruling yet, or issued an order. So I've answered your question three times, but you're so busy trying to talk that you're not listening. Please stop and listen. I know this is very important to you. I know you have a lot of things that you want to share with me about it. But I need to make a ruling, so that's the first thing I plan to do. So until I do that, I don't want to hear from anybody about anything.

So first things first, again, there's a lot of things that we have to do in this case. I don't mean to be brusque about it, but again, I'm not talking about any appeals until we actually do the actual thing that needs to be decided.

So Mr. Huebner, I think I have the updates from you. And with that, I will turn to the business of entering the Court's ruling in this matter.

MR. HUEBNER: So Your Honor, just one very last

be very clear. I just said something that I know to be true, but I don't know that I necessarily have it stated on the record.

I understand that all of the Creditor constituencies support the extension of the preliminary injunction at this point so as to accomplish what needs to be done between now and the effective date when that injunction will be lifted.

MR. HUEBNER: Yeah, Your Honor, sometimes people care about the distinction between "we have no objection" and "we support," but I'll say that we certainly know of no group that either does not support it, or has said that they have no objection to it.

THE COURT: All right. Thank you.

MR. HUEBNER: So with the Court's approval, I'll turn the podium over to Mr. Shore for a quick pass through the uncontested 503(b) application, and then I think we can call it a day.

THE COURT: All right. Thank you very much.

MR. SHORE: Good afternoon, Your Honor. Chris Shore from White & Case on behalf of the Ad Hoc Personal Injury Group, with respect to the group's motion for substantial contribution, which is at ECF 8051. The motion was filed on October 17th with the support of the Debtors and the UCC. The objection deadline was November 5th, with

No. _____

IN THE

SUPREME COURT OF THE UNITED STATES

ROSEMARY HELEN ZIZIROS WALKER — APPLICANT

v.

PURDUE PHARMACEUTICALS AND THE SACKLER FAMILY — RESPONDENTS

PROOF OF SERVICE

I, Rosemary Helen Ziziros Walker, do swear or declare that on this date, 10.21.26, as required by Supreme Court Rule 29 I have served the enclosed EMERGENCY APPLICATION FOR AN ADMINISTRATIVE STAY AND STAY PENDING THE TIMELY FILING AND DISPOSITION OF A PETITION FOR A WRIT OF CERTIORARI on each party to the above proceeding or that party?s counsel, and on every other person required to be served, by depositing an envelope containing the above document in the United States mail properly addressed and with first-class postage prepaid.

The names and addresses of those served are as follows:

PURDUE PHARMA C/O DAVIS POLK
450 Lexington Avenue, New York, NY 10017
212-450-4000
USPS Certified Mail Tracking No.: 9589 0710 5270 3518 2872 12

The Sackler Family c/o Anne Penachio
Penachio Malara LLP
245 Main Street, White Plains, NY 10601
914-946-2889
USPS Certified Mail Tracking No.: 9589 0710 5270 3518 2872 05

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 10.21.26.

Signature: _____

ROSEMARY HELEN ZIZIROS WALKER

RECEIVED
OCT 27 2026
OFFICE OF THE CLERK
SUPREME COURT, U.S.