

ROUTT COUNTY BOARD OF COUNTY COMMISSIONERS

Timothy V. Corrigan
District I

Douglas B. Monger
District II

M. Elizabeth Melton
District III

Commissioners' Daily COVID-19 Agenda July 15, 2020

Times listed on the agenda are approximations and may be longer or shorter with no notice. Agendas are subject to change 24 hours before the meeting start time. To ensure you have the most up-to-date information, please check the agenda after 24 hours of its start time.

If you are joining the meeting for a specific item, please join 10 minutes before the item to ensure you are present for the beginning of the item.

Please click the link below to join the webinar:

<https://us02web.zoom.us/j/85106670945?pwd=UXZZSGx1Q01Mc0s2cklGVk13Qld5UT09>

Password: 522

Or Telephone:

Dial(for higher quality, dial a number based on your current location)

US: +1 253 215 8782 or +1 346 248 7799 or +1 669 900 6833 or +1 301 715 8592 or +1 312 626 6799 or +1 929 205 6099

Webinar ID: 851 0667 0945

Password: 522

The Routt County Board of County Commissioners or Board of Health may enter executive session pursuant to C.R.S. 24-6-402(4)(b) to receive legal advice related to specific legal questions concerning Routt County's COVID-19 response.

1. 10:00 A.M. **CALL TO ORDER**
2. 10:00 A.M. **WEEKLY BOARD OF HEALTH UPDATE**
Presenters: Public Health Director Kari Ladrow and Dr. Harrington

TRAVEL GUIDANCE

Review of draft travel guidance for Routt County.

Documents:

[BCC AGENDA COMMUNICATIONS FORM TRAVEL GUIDANCE.PDF](#)

3. 11:00 A.M. PUBLIC COMMENT

Public Comment will be heard on any item except quasi-judicial land use items. County Commissioners will take public comment under consideration but will not make any decision or take action at this time.

1. DUE TO THE CURRENT PANDEMIC, THE COUNTY COMMISSIONERS REQUEST CITIZENS ATTEND THE MEETINGS VIA PHONE. To make a public comment raise your hand on the zoom platform if online; if calling in press *9. Another option is to download the Zoom app that allows you to raise your hand as well. The moderator will then select you when it is your turn. Written public comment can also be submitted to BCC@CO.ROUTT.CO.US. Please make sure to indicate in the subject line of your email that it is public comment and reference the agenda item to which it relates. Public comments will be entered into the record.

4. 11:10 A.M. COVID-19 WORK SESSION

The Commissioners will address critical items for regular county and emergency operations related to the COVID-19 pandemic. Action may be taken and direction to staff may be given in relation to any of these items.

5. 11:50 A.M. CONSIDERATION OF FILING A CLAIM IN THE PURDUE BANKRUPTCY

consideration of filing a claim in the Purdue Bankruptcy

Documents:

[PURDUE BANKRUPTCY CLAIM.PDF](#)
[PURDUE PHARMA.PDF](#)

6. 12:00 P.M. MEETING ADJOURNED

Please click the link below to join the webinar:

[https://us02web.zoom.us/j/85106670945?
pwd=UXZZSGx1Q01Mc0s2cklGVk13Qld5UT09](https://us02web.zoom.us/j/85106670945?pwd=UXZZSGx1Q01Mc0s2cklGVk13Qld5UT09)

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8592 or +1 312 626 6799 or +1 929 205 6099

Webinar ID: 851 0667 0945

Password: 522

All programs, services and activities of Routt County are operated in compliance with the Americans with Disabilities Act. If you need a special accommodation as a result of a disability, please call the Commissioners Office at (970) 879-0108 to assure that we can meet your needs. Please notify us of your request as soon as possible prior to the scheduled event. Routt County uses the Relay Colorado service. Dial 711 or TDD (970) 870-5444.



ROUTT COUNTY BOARD OF COUNTY COMMISSIONERS

AGENDA COMMUNICATION FORM

| | |
|----------------------|---------------------|
| ITEM DATE: 7/15/2020 | ITEM TIME: 10:00 AM |
| | |

| | |
|---|----------------------------|
| FROM: | Dr. Harrington |
| TODAY'S DATE: | |
| AGENDA TITLE: | Travel Guidance Discussion |
| CHECK ONE THAT APPLIES TO YOUR ITEM: | |
| ACTION ITEM | |
| DIRECTION | |
| X INFORMATION | |
| I. DESCRIBE THE REQUEST OR ISSUE: | |
| The Board of Health with discuss the presented travel guidance document. | |
| II. RECOMMENDED ACTION (<i>motion</i>): | |
| | |
| III. DESCRIBE FISCAL IMPACTS (VARIATION TO BUDGET): | |
| PROPOSED REVENUE (<i>if applicable</i>): | |
| CURRENT BUDGETED AMOUNT: \$0.00 | |
| PROPOSED EXPENDITURE: | |
| FUNDING SOURCE: | |
| SUPPLEMENTAL BUDGET NEEDED: YES NO | |
| . | |
| IV. IMPACTS OF A REGIONAL NATURE OR ON OTHER JURISDICTIONS (IDENTIFY ANY COMMUNICATIONS ON THIS ITEM): | |
| | |



ROUTT COUNTY BOARD OF COUNTY COMMISSIONERS
AGENDA COMMUNICATION FORM

V. BACKGROUND INFORMATION:

VI. LEGAL ISSUES:

VII. CONFLICTS OR ENVIRONMENTAL ISSUES:

VIII. SUMMARY AND OTHER OPTIONS:

IX. LIST OF ATTACHMENTS: Supplemental Budget Request



**TRAVEL RECOMMENDATIONS
KEEP ROUTT COUNTY HEALTHY**

Routt County aims to protect residents, visitors, and businesses by reducing the transmission of COVID-19. One of the risks for community transmission is traveling. Whether you are visiting Routt County, or you are a resident embarking on a trip out of town, please consider these recommendations as way to keep you, your family, your workplace and our community safe.

These recommendations are built on these Five Pillars:

- I. Practice the Five Commitments at home and while traveling – even when they are not required by local regulations
- II. Avoid COVID-19 hotspots whenever possible
- III. Assess the risk of activities you participate in while traveling
- IV. Limit interactions for two weeks after travel to/from hotspots
- V. Limit interactions before you travel

I. PILLAR ONE: PRACTICE THE FIVE COMMITMENTS

1. Maintain social distancing of 6 feet or more
2. Wash hands often
3. Cover your face in public
4. Stay at home if at risk or when sick
5. Seek testing immediately if you develop symptoms

II. PILLAR TWO: CHECK COVID-19 HOTSPOTS BEFORE YOU TRAVEL

See Harvard’s Global Health Institute: <https://globalepidemics.org/key-metrics-for-covid-suppression/> to monitor states and counties COVID-19 positivity rate. A hotspot would be a state that has positive tests in excess of 10%, or a number of positive cases exceeding 10 per 100,000 residents.

III. PILLAR THREE: ASSESS WHAT TYPE OF ACTIVITIES YOU PARTICIPATE IN WHILE TRAVELING

If you answer yes to the following questions, you may be at high risk of bringing the COVID-19 virus to Routt County:

- Did you participate in a gathering event, such as a wedding?
- Did you mingle with people outside of your usual circle of close contacts?
- Did you and others interact without wearing face masks?
- Did you travel on an airplane?
- Did you travel to a foreign country?

- Did you travel to a state or other location in the United States considered to have high community spread of COVID, a “hotspot?”
 - Low risk example: Took your family camping somewhere in Colorado.
 - High risk example: Flew to attend a large wedding. No one wore masks.

IV. PILLAR FOUR: LIMIT INTERACTIONS FOR TWO WEEKS AFTER TRAVEL TO/FROM HOTSPOTS

Anyone who has traveled out of Routt County, or to Routt County, from a COVID-19 hotspot should consider the following options. Every traveler is advised to engage in the most restrictive limitation on interactions that is practicable for their situation. Options for limiting interactions include:

- A. **Restrict activities to reduce the spread of COVID-19.** There are measures that can mitigate the risk of spreading COVID-19, whether you are a visitor or a resident. Consider doing as many of the following options for 14 days, especially if you are coming from a hot spot location.
- Always Practice the Five Commitments to Containment
 - Do not use public transportation
 - Do not prepare food for others outside your household
 - Do not share food with others outside your household
 - Do not share items like towels or utensils
 - Disinfect surfaces frequently
 - Keep windows open
 - If possible, stay in a separate bedroom and use a separate bathroom
 - Move into a separate workspace with reduced contact with co-workers
 - Work from home
 - Avoid local businesses and other public places
 - Do not interact with customers
 - Spread out work shifts to have less interaction with others
- B. **Self-quarantine for 14 days** and monitor for the development of COVID- 19 symptoms. A full self-quarantine is the safest way to avoid inadvertent transmission but is not always possible. You may return to work and community involvement after 14 days without symptoms. How to quarantine: <https://covid19.colorado.gov/how-to-quarantine>.
- C. **Get Tested.** If you think you were in a risky situation or exposed to a positive case or if you have symptoms, get tested by a local health care provider or the Public Health Department community testing.

- V. PILLAR FIVE: LIMIT INTERACTIONS BEFORE YOU TRAVEL.** Preventing infections at their source is an important public health concept. While the quarantine concept is usually mentioned in reference to after a person travels, quarantine concepts are also important before a person travels. Reducing your potential exposure to COVID-19 before your travel is important for the people and places you visit on your travel. In the two weeks before you travel consider limiting your social interactions, avoid group gatherings, etc. as outlined above And of course, you should not travel if you are sick or have COVID-19 symptoms.

ROUTT COUNTY BOARD OF COUNTY COMMISSIONERS

AGENDA COMMUNICATION FORM

| | |
|---------------------------------|------------------------------|
| ITEM DATE: July 15, 2020 | ITEM TIME: 11:50 a.m. |
|---------------------------------|------------------------------|

| | |
|----------------------|---|
| FROM: | Erick Knaus |
| TODAY'S DATE: | July 14, 2020 |
| AGENDA TITLE: | Consideration of filing a claim in the Purdue Pharma, L.P. Bankruptcy Case. |

| | |
|--|--|
| CHECK ONE THAT APPLIES TO YOUR ITEM: | |
| <input checked="" type="checkbox"/> X ACTION ITEM | |
| <input type="checkbox"/> DIRECTION | |
| <input type="checkbox"/> INFORMATION | |

I. DESCRIBE THE REQUEST OR ISSUE:

Consideration of filing a claim in the Purdue Pharma, L.P. Bankruptcy case and consideration for authorization to allow the County Attorney to sign a Consolidated Claim Authorization Form.

II. RECOMMENDED ACTION:

Motion to approve the filing a claim in the Purdue Pharma, L.P. Bankruptcy case and authorization for the County Attorney to sign a Consolidated Claim Authorization Form.

III. DESCRIBE FISCAL IMPACTS (VARIATION TO BUDGET):

PROPOSED REVENUE:

PROPOSED EXPENDITURE:

FUNDING SOURCE:

Unknown.

IV. IMPACTS OF A REGIONAL NATURE OR ON OTHER JURISDICTIONS (IDENTIFY ANY COMMUNICATIONS ON THIS ITEM):

N/A

V. BACKGROUND INFORMATION:

See attached information.

ROUTT COUNTY BOARD OF COUNTY COMMISSIONERS
AGENDA COMMUNICATION FORM

VI. LEGAL ISSUES:

The information regarding this issue was not received until July 13th. To be included in the Governmental Entity Consolidated Claim, the consent must be filed by July 15th.

VII. CONFLICTS OR ENVIRONMENTAL ISSUES:

N/A

VIII. SUMMARY AND OTHER OPTIONS:

N/A

Co-Lead Counsel and Plaintiffs' Executive Committee,
In re: National Prescription Opiate Litigation, MDL 2804
purdue@pecmdl2804.com



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June 18, 2020

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

Re: Filing a Proof of Claim in the Purdue Bankruptcy

To whom it may concern:

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

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

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

The Proof of Claim form asks for the amount of your claim against Purdue. To help you determine this amount, you can visit <https://purduelocalgovtclaims.info>, which has estimates of damages and abatement costs for most counties, cities, and other municipalities in the U.S. Follow the directions on the web page to see the estimate for your Government Entity. These estimates were developed by an economic expert at the request of the ad hoc committee of governmental and other contingent litigation claimants in the Purdue Bankruptcy Cases ("Ad Hoc Committee"). Please carefully read the Proof of Claim form and note that you, and only you, are responsible for the statements you make in your proof of claim.

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

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

Sincerely,

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





Co-Lead Counsel:

Paul J. Hanly, Jr.
SIMMONS HANLY CONROY LLC

Joseph F. Rice
MOTLEY RICE LLC

Paul T. Farrell Jr.
FARRELL Law

Plaintiffs' Executive Committee:

Don Barrett
BARRETT LAW GROUP, P.A.

Elizabeth Cabraser
LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

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

Erin Dickinson
CRUEGER DICKINSON LLC

James R. Dugan
THE DUGAN LAW FIRM, APLC

Paul J. Geller
ROBBINS GELLER RUDMAN & DOWD LLP

Michael J. Fuller
HCHUGH FULLER LAW GROUP

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

Mark Lanier
LANIER LAW FIRM

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

Ellen Relkin
WEITZ & LUXENBERG, P.C.

Lynn Sarko
KELLER ROHRBACK

Hunter J. Shkolnik
NAPOLI SHKOLNIK PLLC

Christopher A. Seeger
SEEGER WEISS LLP

Roland Tellis
BARON & BUDD, P.C.

James D. Young
MORGAN & MORGAN

Co-Liaison Counsel:

Peter Weinberger
SPANGENBERG SHIBLEY
& LIBER, LLP

Steve Skikos
SKIKOS, CRAWFORD,
SKIKOS AND JOSEPH

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



DAVID J. MOLTON
direct dial: 212.209.4822
fax: 212.938.2822
dmolton@brownrudnick.com

June 17, 2020

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

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

THIS IS NOT A SOLICITATION TO VOTE ON ANY BANKRUPTCY PLAN

To whom it may concern:

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

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

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

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

¹The Ad Hoc Committee is composed of: (1) Broward County, Fl.; (2) City of Chicago, Ill.; (3) Huntington/Cabell County; (4) King County, WA.; (5) Muscogee (Creek) Nation; (6) the Court appointed Co-Lead Counsel on behalf of the Court appointed Plaintiffs' Executive Committee in *In re National Prescription Opiate Litigation*, Case No. 17-md-02804, MDL No. 2804 (the "PEC"); (7) the City of Philadelphia, Pa.; (8) Santa Clara County, Ca.; (9) State of Florida; (10) State of Georgia; (11) State of Louisiana; (12) State of Michigan; (13) State of Mississippi; (14) State of New Mexico; (15) State of Ohio; (16) State of Tennessee; (17) State of Texas; and (18) State of Utah.

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





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

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

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

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

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

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

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

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

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

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



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

Sincerely,
BROWN RUDNICK LLP

/s/ David J. Molton

David J. Molton

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EXHIBIT A

Collective Theories

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

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

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

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

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

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

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

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





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EXHIBIT B

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

CONSOLIDATED CLAIM AUTHORIZATION FORM

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

The undersigned claimholder in connection with the bankruptcy estates of *In Re Purdue Pharma, L.P., et al.*, Case No. 19-23649 (RDD) (Bankr. S.D.N.Y.) (the "Consenting Claimant") hereby elects to schedule and file any and all claims held against the **Purdue Debtors**¹ as part of a consolidated claim (the "Consolidated Claim"), as allowed pursuant to that order establishing **5:00 p.m. (Prevailing Eastern Time) on July 30, 2020** as the last date for each person or entity, including cities, counties, municipalities, other local governments and Native American Tribes, to file a Proof of Claim against any of the Purdue Debtors (the "Bar Date Order" at Docket No. 800)⁵.

For the avoidance of doubt, the Consenting Claimant⁶ understands and acknowledges that the Consolidated Claim, including but not limited to the Collective Theories, the Claim Amount, and all applicable information in the Consolidated Claim Summary Information Sheet, will be treated as the Consenting Claimant's own Proof of Claim filed against each of the Purdue Debtors, and the Consenting Claimant agrees to be so bound for all Proof of Claim purposes subject to the following. In the event that the Consenting Claimant has already filed or will file a separate and individual Proof of Claim against each or any of the Purdue Debtors, such separately filed Proof of Claim shall override the Consolidated Claim, so long as it otherwise complies with the Bar Date Order. The Consenting Claimant further acknowledges and agrees that the Ad Hoc Committee's only purpose is to facilitate the process by which Government Entities can participate in a Consolidated Claim and the Ad Hoc Committee: (1) takes no position concerning any Government Entity's individual claim(s) against Purdue and (2) is not adopting the Consolidated Claim as a claim on behalf of the Ad Hoc Committee. The Consenting Claimant hereby authorizes the Ad Hoc Committee, through any one or more of the following (the "Authorized Representative") to submit the Consolidated Claim: Kramer Levin Naftalis & Frankel LLP, Otterbourg P.C., Brown Rudnick LLP, Gilbert LLP.

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

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

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

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

Number Street

City State Zip Code

¹Purdue Pharma, L.P., Purdue Pharma Inc., Purdue Transdermal Technologies L.P., Purdue Pharma Manufacturing L.P., Purdue Pharmaceuticals L.P., Imbrium Therapeutics L.P., Adlon Therapeutics L.P., Greenfield Bio Ventures L.P. Seven Seas Hill Corp., Ophir Green Corp., Purdue Pharma of Puerto Rico, Avrio Health L.P., Purdue Pharmaceutical Products L.P., Purdue Neuroscience Company, Nayatt Cove Lifescience Inc., Button Land L.P., Rhodes Associates L.P., Paul Land Inc., Quidnick Land L.P., Rhodes Pharmaceuticals L.P., Rhodes Technologies, UDF LP, SVC Pharma L.P., and SVC Pharma Inc. (collectively, the "Purdue Debtors," "Debtors" or "Purdue").

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

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





2. Attorney Information, if any:

Name of Attorney & email address

Number Street

City State Zip Code

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

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

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

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

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

Date:

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

Phone Number Email

Consenting Claimant's Signature



"4539001626683"

Exhibit C

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

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