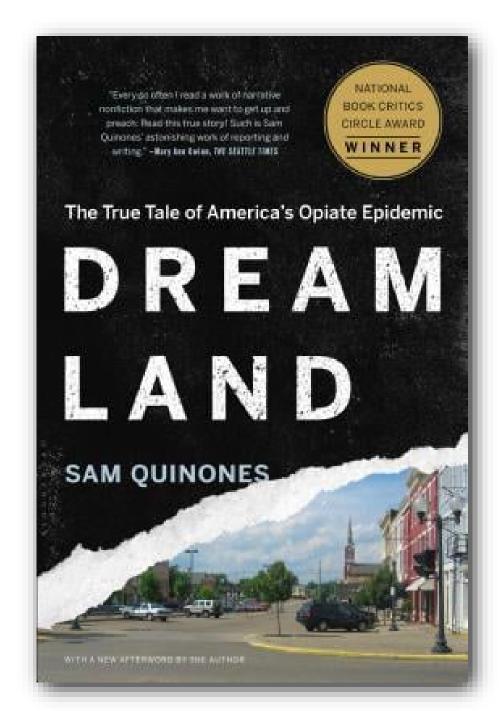




Morphine

"Like no other particle on earth, the morphine molecule seemed to possess heaven and hell. It allowed for modern surgery, saving and improving too many lives to count. It stunted and ended too many lives to count with addiction and overdose . . . no other molecule in nature provided such merciful pain relief, then hooked humans so completely, and punished them so mercilessly for wanting their freedom from it."

Sam Quinones, Dreamland: The True Tale of America's Opiate Epidemic



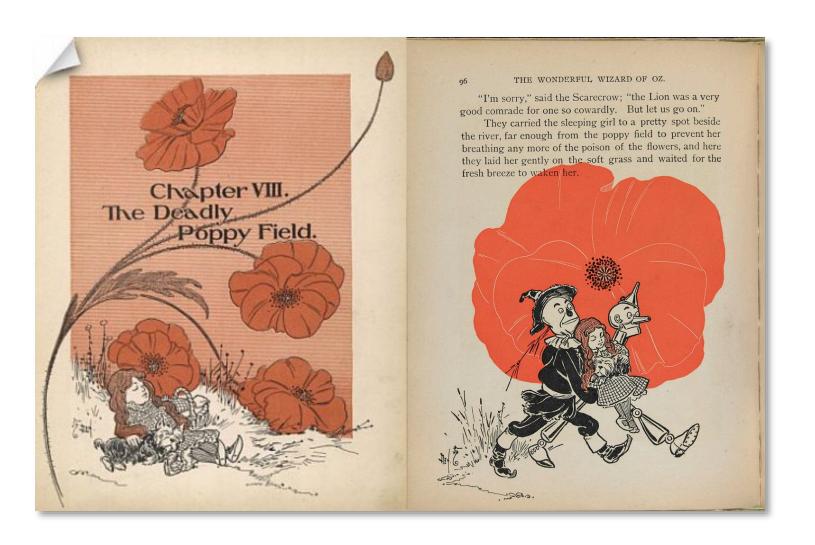


OPIUM IS FOUND
IN THE FLUID
("LATEX") OF THE
POPPY SEED POD.





DANGERS OF OPIUM KNOWN FOR OVER A CENTURY



The Deadly Poppy Field

"And now my beauties, something with poison in it I think, with poison in it, but attractive to the eye and soothing to the smell . . . poppies, poppies, poppies will put them to sleep."

The Wonderful Wizard of Oz, First Edition, 1900





A FULL BLOWN EPIDEMIC

Every day in America, more than 1,000 people are treated in emergency rooms for misuse of opioids.

More than **564,000 people died** from overdoses involving any opioid, including prescription and illicit opioids, from **1999-2020**.

Opioid deaths are now the **number one killer** of Americans under 50.

Annual Opioid deaths now **exceed** the number of Americans killed by **gun violence** and **motor vehicle accidents** each year and the total number of Americans killed during the Vietnam War.

A recent study estimated that aggregate societal costs exceed \$78.5 billion.¹

 Based on data from 2013, which substantially undervalues the present economic impact

OPIOID OVERDOSE ER VISITS CONTINUE TO RISE

30%

Opioid overdoses went up 30% from July 2016 through September 2017 in 52 areas in 45 states. 70%

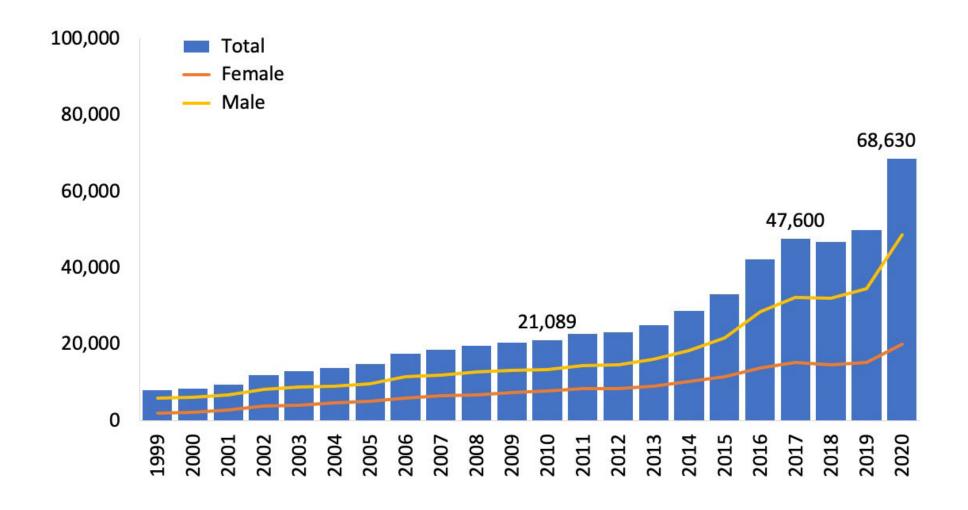
The Midwestern region witnessed opioid overdoses increase 70% from July 2016 through September 2017.

54%

Opioid overdoses in large cities increased by 54% in 16 states.

Emergency department visit rates because of an opioid overdose increased by 28.5% across the U.S. in 2020, compared to 2018 and 2019, recent Mayo Clinic research finds.

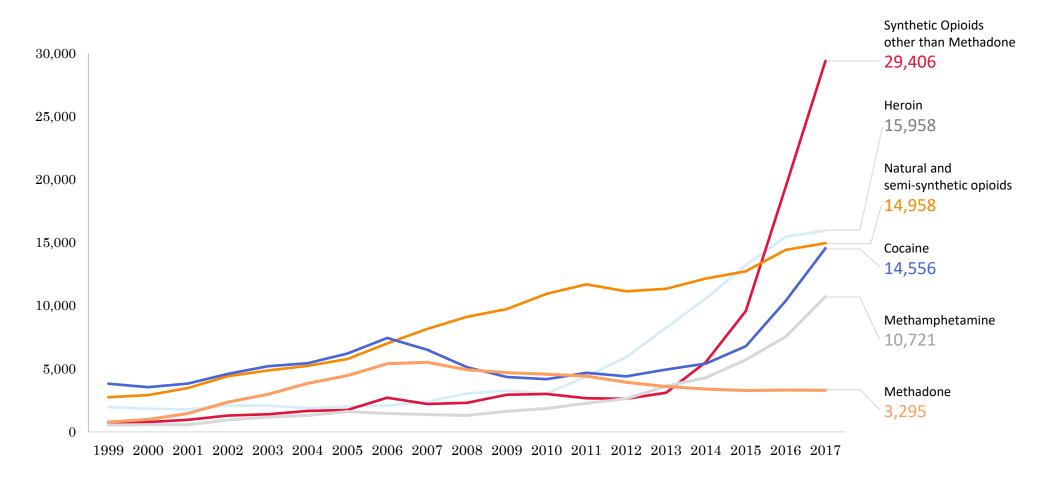
NATIONAL OVERDOSE DEATHS





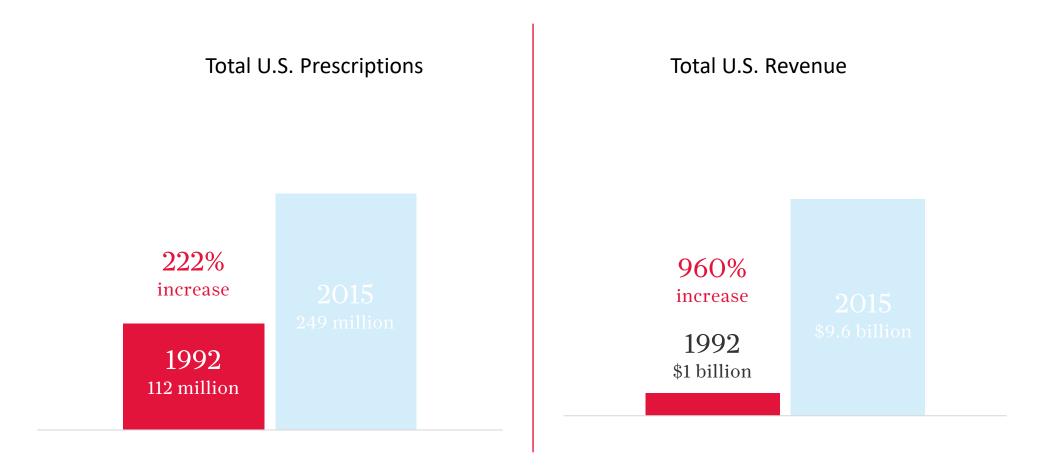
DRUGS INVOLVED

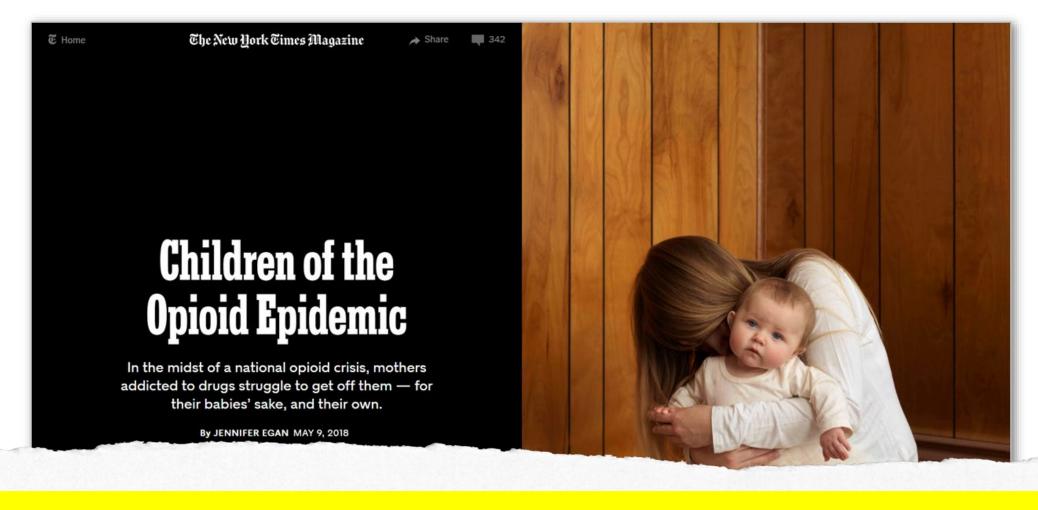
Drugs Involved in U.S. Overdose Deaths, 1999 to 2017



INCREASING PRESCRIPTIONS OF OPIOIDS

Opioids have expanded from being prescribed for short-term (traumatic injury or surgery) or severe pain (e.g., cancer or end-of-life care) to treatment for chronic pain (e.g., back pain).





Experts estimate that a baby with NAS is born in America every 15 minutes.



Cost Of U.S. Opioid Epidemic Since 2001 Is \$1 Trillion And Climbing

Greg Allen | February 13, 2018



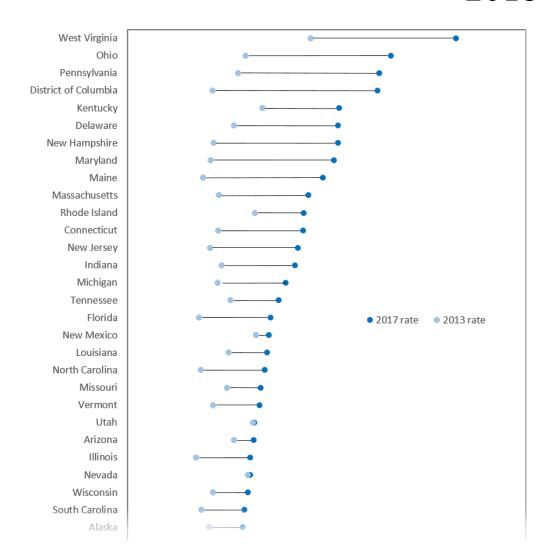
The opioid epidemic has cost the U.S. more than a trillion dollars since 2001, according to a new study, and may exceed another \$500 billion over the next three years.

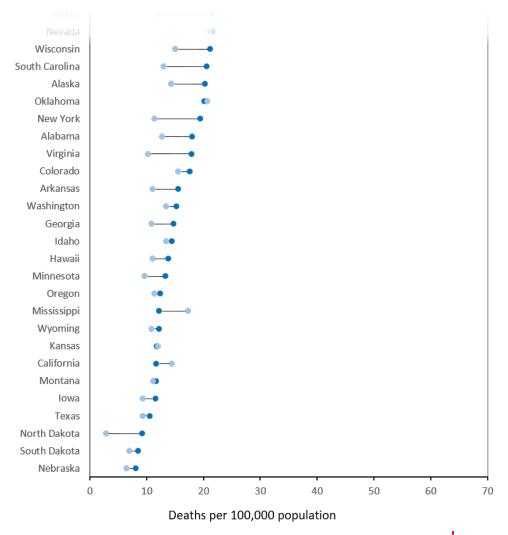
The report by Altarum, a nonprofit group that studies the health economy, examined CDC mortality data through June of last year. The greatest financial cost of the opioid epidemic, according to the report, is in lost earnings and productivity losses to employers. Early deaths and substance abuse disorders also take a toll on local, state and federal government through lost tax revenue.

These costs are rising. One reason for the increase, says Corey Rhyan, a senior research analyst with Altarum's Center for Value and Health Care, is that more young people are being affected as the epidemic moves from prescription opioids to illicit drugs like heroin and fentanyl.

"The average age at which opioid deaths are occurring — you're looking at something in the late 30s or early 40s," Rhyan says. "As a result, you're looking at people that are in the prime of the productive years of

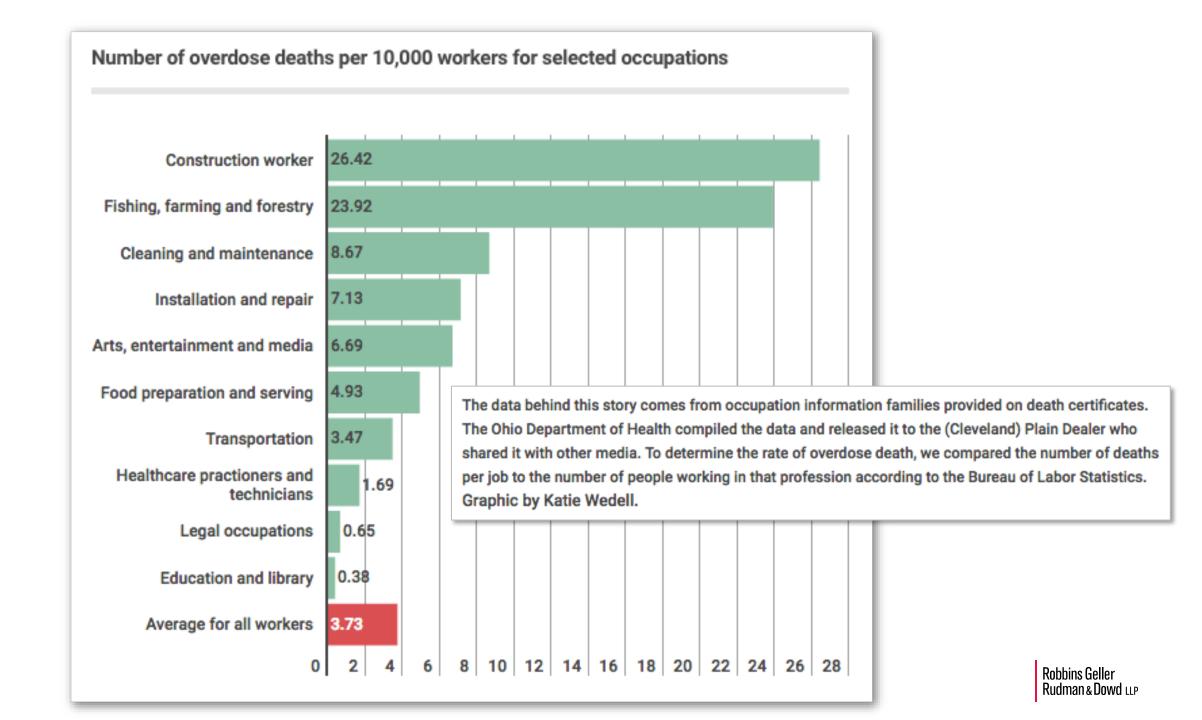
DRUG OVERDOSE DEATH RATE INCREASES 2013-2017



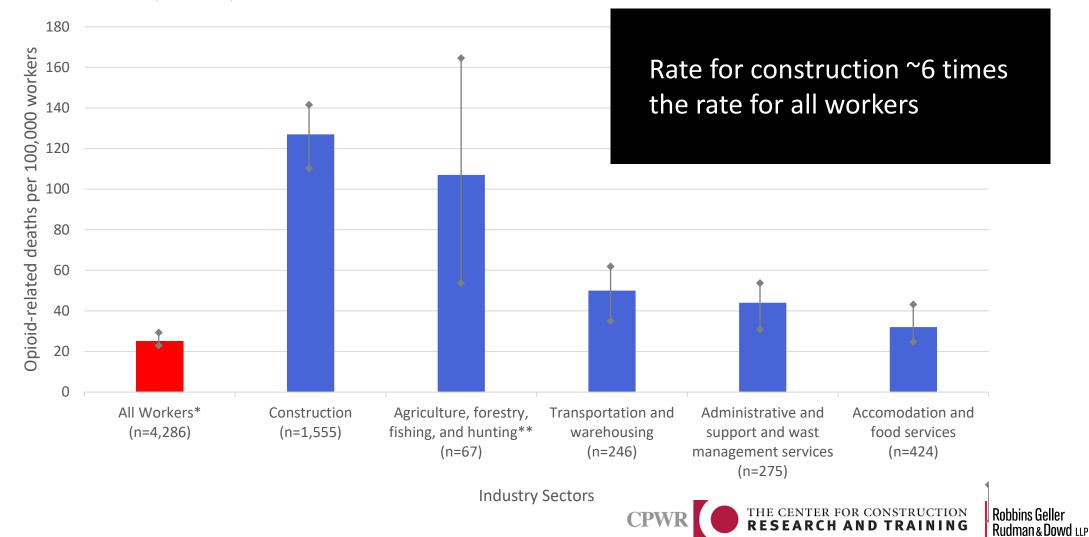


THE OPIOID CRISIS IN THE BUILDING TRADES

- The construction industry has *twice the national average* of employees with substance use disorders.
- Within union health and welfare plans, powerful painkillers are among the *top five medications prescribed* to members.
- The primary workforce in construction is male, and they're *twice as likely* to abuse prescription drugs than females.
- The average construction worker addicted to opioids has been on pain medications for *at least six months*.
- The average age at which Ohio construction workers have died of opioid overdoses over the last seven years is *40 years old*.



Industry sectors with opioid-related overdose death rates significantly higher than the average rate for all workers, Massachusetts workers, 2011-2015, n=4,302



Forbes



The trillion-dollar industry has been *hit harder than almost any other* sector of the economy in a health crisis that takes nearly 100 American lives each day.

Construction workers, by the physical nature of their jobs, often suffer the wear and tear on the body that, in recent history, would have led doctors to *prescribe opioid pain medication in order to allow them to return to the work site*. But the short-term solution can have long-term ramifications, both personal and financial.

The Silent Killer On The Job Site: Inside Construction's Battle With Opioids

OCT 26, 2017 @ 03:09 PM

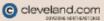
The American opioid crisis was declared a national public health emergency Thursday, but the U.S. construction industry does not seem ready to take action regarding its own significant role in the deadly epidemic.

The trillion-dollar industry has been hit harder than almost any other sector of the economy in a health crisis that takes nearly 100 American lives each day. But it has been largely silent, more concerned about perception than the number of workers who are addicted to opioids.

Bisnow reporters reached out to — and were rejected by — 17 construction companies and workers at 27 construction sites nationwide. Only two executives were willing to speak on the record. Most explained away silence as not a sign of denial, but of fear over insurance hikes or not wanting to give the illusion they were operating "dirty" sites.

Robbins Geller Rudman & Dowd LLP





Ohio construction workers seven times more likely to die of an opioid overdose in 2016

which are opiods or semi-synthetic opioids.

And, in 2010, more than 80 percent of construction workers whose

injuries were treated with medication were given narcotics, according to

BWC data. Often got medications like Vicodin, Percocet and OxyContin,

Updated Jan 19; Posted Nov 5, 2017

By Rachel Dissell, The Plain Dealer rdissell@plai

CLEVELAND, Ohio -- The carpenter framing a ne downtown. The roofer hauling and laying shingle potholes on the highway.

Construction workers in Ohio were seven times in professions, according to a Plain Dealer analysis in the state from 2010 through 2016.

Outside Boston, public health workers researching opioid-related deaths found that **building and construction workers accounted for 42 percent** of overdoses in a swath of suburbs.

Read how we ana

As an industry, co opioid overdose fa

Most Ohio opioid deceptively marke injuries and were got the pills, preva

Ohio isn't the only public health work percent of overdo

family members and funeral homes on the

There isn't a single reason that men in thes

Pain and pills

Construction work is physical. Swinging a l kneeling all day to smooth cement or lay be

Tough, repetitive work wears down even th knee pain.

The [union-funded rehab] programs can have an unintended consequence, some construction workers said. Once a person fails a drug test or asks for help with addiction, they are off the job. They can get treatment, but they won't get paid for union construction work while they do.

Until about 20 years ago, doctors could do

prescriptions. Stronger drugs, opiates such as morphilie, were notorious for causing addiction, poctors offered them only to patients in excruciating pain, from acute trauma or terminal cancer.

Rudman & Dowd LLP



Construction Work Can Be Dangerous. Now There's Evidence Of Another Risk: Addiction

November 20, 2017

Medford teenagers are making the kind of choices parents applaud

"Underage drinking numbers are going down," said Penelope Funa drug use is going down tremendously." More than half of Medford's opioid overdose victims worked in the trades an umbrella term for everything from highly skilled people building skyscrapers to day laborers picking up the occasional painting job.

Here's what doesn't make sense. The number of people in Medford aying noncopiou overdoses has compediated in the previous four years.

Funaiole wanted to kno

She found answers in the men. Funaiole and her t

"We were like, wait a m

More than half of Medf people building skyscra Coalition, the Medford The public health group followed up with dozens of constructions workers who suggested one reason people in their industry may be vulnerable to addiction: *a link* between getting hurt on the job and then hooked on pain killers.

Wakefield and Reading indicated 42 percent of overdose deaths were among men who worked in the trades

"Are the ones on the job site necessarily the ones who are their most recent occupation."

The public health group followed up with dozens of const vulnerable to addiction: a link between getting hurt on th

"They're given a prescription ... to nullify the pain. And th operations in your brain." "They're given a prescription ... to nullify the pain. And these drugs are very powerful," said Funaiole. "They can really take over operations in your brain."

"They're given a prescription ... to nullify the pain. And these drugs are very powerful. They can really take over operations in your brain" - Penelope Funaiole, Medford prevention and outreach coordinator

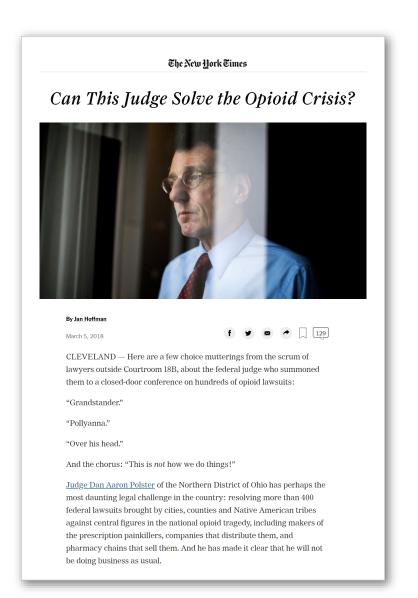
Rudman & Dowd LLP

THE OPIOID LITIGATION AND AFFECTING PUBLIC POLICY THROUGH LITIGATION

Over 3000 Suits Consolidated in the Northern District Of Ohio

Can This Judge Solve the Opioid Crisis?

Alarmed by the opioid epidemic, Judge Dan Polster wants to quickly settle some 400 lawsuits against drug makers and distributors. Lawyers are skeptical he can pull it off.







MANUFACTURER DEFENDANTS

Manufacture, Market and Sell Opioids











DISTRIBUTORS

Buy Opioids from Manufacturers, and Sell to Customers





MCKESSON



Walgreens

DISPENSERS

Sell Opioids at the Retail Level











Oxycontin











OPIOID DRUGS

Oxymorphone Hydrochloride









Oxycodone Hydrochloride

Generic Percocet







Oxycodone Hydrochloride and Ibuprofen







Oxycodone Hydrochloride and Aspirin

Generic

OxyContin



Morphine Sulfate



Hydromorphone Hydrochloride







Fentanyl

Fentanyl Transdermal System (Generic Duragesic Patch)







Oral Transmucosal Fentanyl Citrate (OTFC) (Generic Actiq)



Hydrocodone Bitartrate

Hydrocodone Bitartrate and Ibuprofen (Generic Vicoprofen)



Hydrocodone Bitartrate and Acetaminophen

Kadian









Hydromet





OPIOID DRUGS

Oxymorphone Hydrochloride









Oxycodone Hydrochloride

Generic Percocet





Oxycodone Hydrochloride and Ibuprofen



Generic Roxicodone



Oxycodone Hydrochloride and Aspirin

Generic

OxyContin



Fentanyl

Fentanyl Transdermal System (Generic Duragesic Patch)







Oral Transmucosal Fentanyl Citrate (OTFC) (Generic Actiq)



Morphine Sulfate



Hydromorphone Hydrochloride







Hydrocodone Bitartrate

Hydrocodone Bitartrate and Acetaminophen



Hydrocodone
Bitartrate
and Ibuprofen
(Generic
Vicoprofen)



Hydromet





OPIOID DRUGS

Fentanyl Citrate

Actiq



Fentora



Oxycodone Hydrochloride

Generic Oxycontin ER









Oxymorphone Hydrochloride

Oxymorphone





Hydromorphone Hydrochloride



Fentanyl Citrate

Oral Transmucosal Fentanyl Citrate (OTFC) (Generic Actiq)



Morphine Sulfate



Hydrocodone Bitartrate

Hydrocodone Bitartrate and Ibuprofen(Generic Vicoprofen)



Vantrela ER





FALSE &
MISLEADING
MARKETING







- The FDA relies on manufacturers to be honest about their drugs
- With FDA approval comes very strict rules for marketing and promotion
- Marketing and promotion must be truthful and not misleading
 - can't understate risks or overstate benefits
 - can't engage in misleading promotion under the guise of third parties
 - can't promote for unapproved or "off-label" use

FORMER FDA COMMISSIONER

Identifies Defs' Departures from Accepted Drug Regulatory Standards



David A. Kessler, M.D.

Expert on FDA Standards and implementation

Former FDA Commissioner from 1990 – 1997

- Discusses manufacturer obligations under U.S. food and drug laws
- Discusses departures from industry standards



PURDUE'S MARKETING

- Recruited 5,000+ physicians, nurses, and pharmacists during all-expenses-paid conferences
- Targeted the physicians who were the highest prescribers for opioids across the country
- Purdue paid \$40 million in sales incentive bonuses to its sales representatives
- Distributed OxyContin-branded promotional items to health care professionals, such as OxyContin fishing hats, stuffed plush toys, and music compact discs ("Get in the Swing With OxyContin")



Purdue Aggressively Marketed Oxycontin

- Oxy prescriptions for chronic pain rose from 670,000 in 1997 to 6.2 million in 2002
- In 2007, Purdue and three executives plead guilty to misdemeanor charges of false branding of OxyContin; fined \$634 million
- In 2008, drug overdoses, mostly from opiates, surpassed auto fatalities as leading cause of accidental death in the United States
- Overdose deaths involving opiates rose from ten a day in 1999 to one every half hour by 2012. Abuse of prescription painkillers was behind 488,000 emergency room visits in 2011, almost triple the number of seven years before



THE PURDUE BANDWAGON





Walgreens



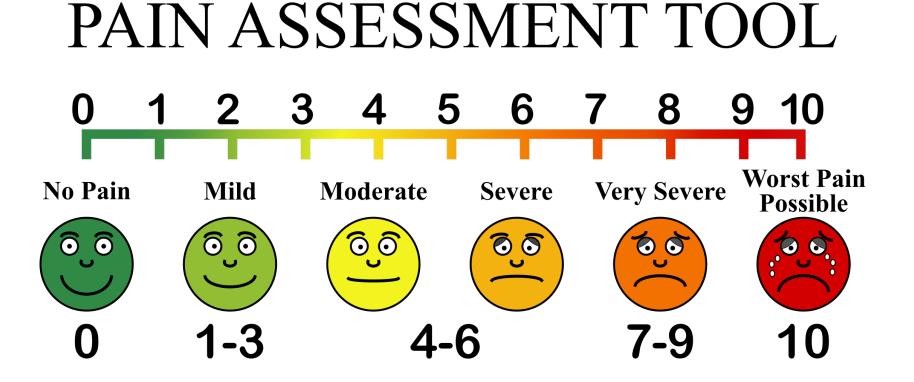






5TH VITAL SIGN

Manufacturers Encourage Prescribers To Asses Pain For Every Patient



MANUFACTURER
DEFENDANTS SAID THAT
THE RISK OF OPIOID
ADDICTION WAS RARE





KADIAN® Learning System

KADIAN® LEARNING SYSTEM

Substance Abuse will be seen in a few patients in every CBP practice, perhaps largely because patients attempting to obtain opioids will eventually end up at a pain management practice. However, despite the continued unscientific beliefs of some clinicians, there is no evidence that simply taking opioids for a period of time will cause substance abuse or addiction. It appears likely that most substance-abusing patients in pain



FENTORA® (fentanyl buccal tablet)
LEARNING SYSTEM

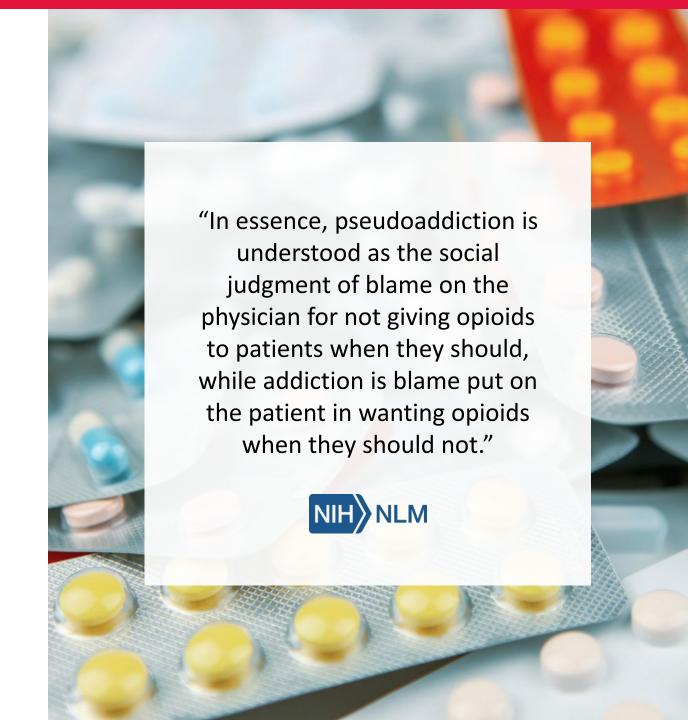
Pre-module
Introduction to Pain

 Tolerance, physical dependence, and addiction are often of concern to patients and professionals. Under medical supervision, appropriate use of opioids rarely leads to addiction.

©2008 Cephalon, Inc.

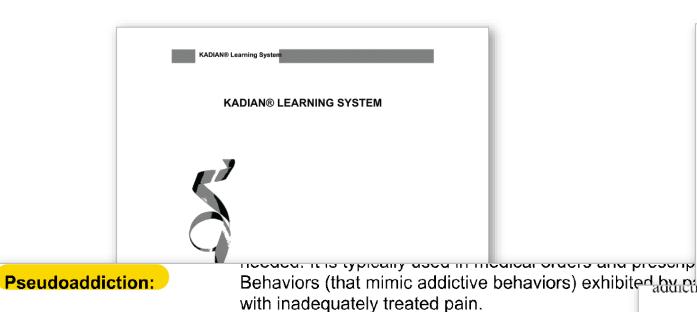
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MANUFACTURING DEFENDANTS PROMOTED THE FALSE IDEA OF PSEUDOADDICTION









FENTORA® (fentanyl buccal tablet) LEARNING SYSTEM

Pre-module

Introduction to Pain

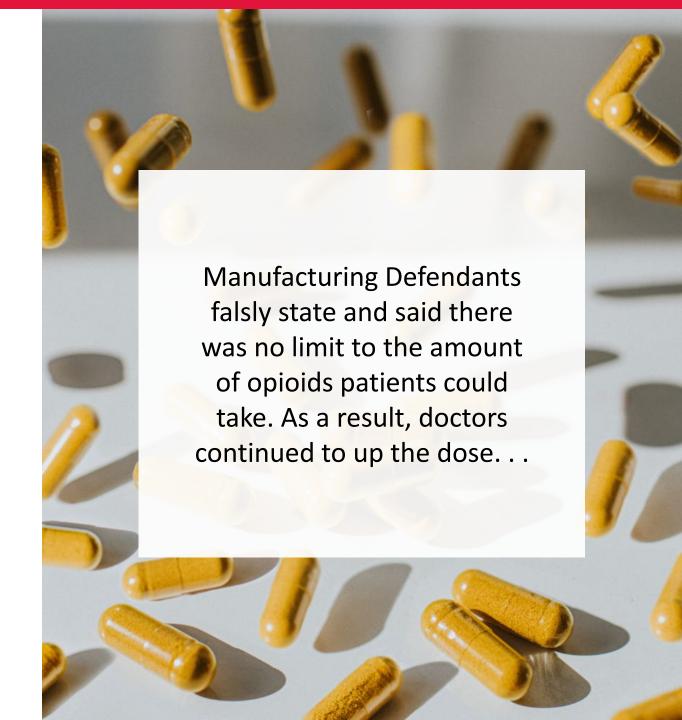
Behaviors (that mimic addictive behaviors) exhibited by properties. [ATA, 2003, 2]

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Certain behaviors are sometimes mistaken for addiction. If patients receive inadequate pain relief, they may exhibit drugseeking behaviors. This is called pseudoaddiction. When these patients receive adequate pain management, they no longer exhibit the same behaviors. Patients in pain do not usually become addicted to opioids. [Kahan, 2006, 1082–1083; NPC and JCAHO,

form without written permission from Cephalon, Inc

MANUFACTURING DEFENDANTS FALSELY CLAIMED THERE WAS NO DOSING LIMIT









Managing Chronic Pain and the Importance of Customizing Opioid Treatment

Morphine Is the Benchmark Analgesic

- The gold standard in pain control—reliable, with proven efficacy and safety when taken appropriately¹⁻⁴
- Improves quality of life for patients, helping to maintain daily activity, independence, mental awareness, and dignity⁴
- Appropriate for both malignant and nonmalignant chronic pain⁵
- No ceiling dose or acetaminophen toxicity⁶

1. American Pain Society, Principles of Analgesic Use in the Treatment of Acute Pain and Cancer Pain. 5th ed. Glenview, It.: American Pain Society, 2003. 2. Oxford Textbook of Paillative Medicine. 2nd ed. Doyle D. Hanks GWC, MacDonald N. eds. Oxford, England: Oxford University Press; 1988. 3. Labby D. Koder M. Amann T for Oregon Health and Science University, Opicids and Chronic Non-malignant Pain: A Clinicians' Handbook. Oregon Health and Science University, Portland. OR. Available at: http://www.ohsu.edu/ahecipain/appendixB.pdf. Accessed February 13, 2008. 4. Red River Valley Group. Myfhs about morphine. Hospice of Red River Valley Newsletter. Volume 11, Issue. 5. Available at: http://www.hrrv.org/pdff/DT1/203.pdf. Accessed February 13, 2008. 5. American Pain Society. Guideline for the Management of Pain in Osteoarthritis. Rheumatoid Arthritis, and Juvenile Chronic Arthritis. 2nd ed. Glenview, It.: American Pain Society, 2002. 6. KADIAN® Package Insert. Piscataway, NJ: Alpharma Pharmaceuticals LLC.



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The other opioids can relieve severe pain. Their doses can be gradually increased over time. There is no ceiling dose as there is with the NSAIDs. As pain worsens, these medications continue to be useful unless side effects occur. It is a myth that opioids, like morphine should only be used at the final stages of a seriously painful disease. When pain is severe, opioids should be considered.

- Sophisticated, well-developed brand and generics marketing departments
- All national marketing policies were employed in San Francisco
- DDMAC Warning Letter
- Continued to market opioids with messaging DDMAC found misleading

- All sales reps trained with misleading messages about opioids
- Sales force tasked with selling brand and generic opioids
- "Main messages" being "long history of safe and efficacious use, favorable formulary position and copay program"
- Mail campaign targeted top 10,000 highest prescribers to sell Opana ER

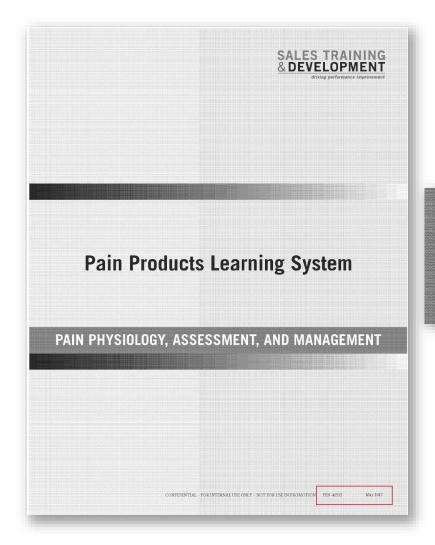
- Incentive compensation, "Contest" and "bonus plan" for sales reps that sold most opioids
- Sales force target: 1306 generic kadian prescriptions per day
- Sales force targeted 5500 of highest prescribers to sell generic kadian

MANUFACTURERS

Trained All Sales Reps with False Messaging

- Used IMS to track prescription level data
- Paid Valutrack for unblinding of pharmacy data
- Trained all sales reps around the country with same materials
- Targeted "high-volume generic MS writers" "to drive growth"
- Goal: 26,000 generic kadian Rx's per week
- Goal: 1306 generic kadian Rx's per day

Manufactuer Trained Its Sales Reps to Downplay Risks ...

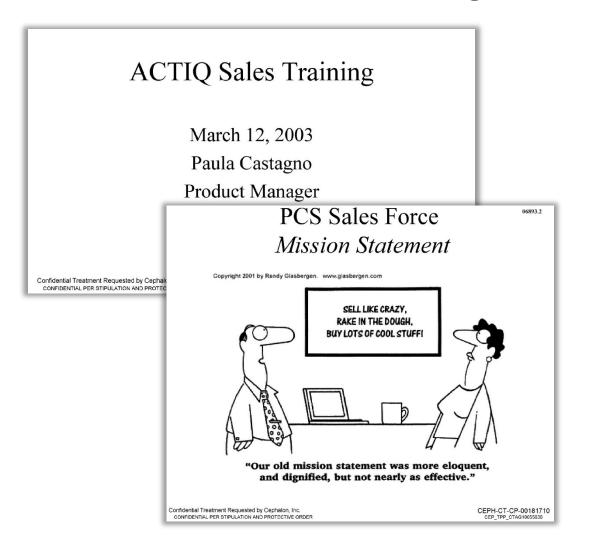


Opiophobia, or fear of prescribing opioids, extends to physicians as well as patients. A number of physician surveys have indicated that clinicians are reluctant to prescribe opioid analgesics in noncancer patients due to fear of iatrogenic addiction, lack of understanding of addiction, concerns about differentiating drug-seeking patients from those with legitimate pain, and regulatory scrutiny. Therefore, opiophobia leads to undertreatment of patients who are suffering from pain, but, according to the statistics, does not seem to be reducing misuse, abuse, and diversion.

"Patients with chronic pain need medications; the potential for abuse should not deter physicians from prescribing appropriate medications in adequate dosages. To help primary care providers confidently select the most appropriate medication for the situation, NIDA is working to develop screening and diagnostic tools that primary care physicians can use to assess the potential for misuse, abuse, and dependence on prescription drugs in their patients."

Exposure to a potentially addictive drug, such as an opioid, does not necessarily result in addiction. Although the actual risk of addiction is unknown, in general, patients in pain do not become addicted to opioids. One study cited by the NIDA found that only 4 out of about 12,000 patients prescribed opioids for acute pain became addicted; in one small study of patients with chronic pain who received opioids for 4 to 7 years, about 5% (2 of 38) became addicted, and these patients had a prior history of drug abuse. Genetic, social, and psychological factors appear to be stronger determinants of addiction than does drug exposure alone. However, surveys suggest that clinicians often overestimate the risk of addiction.

... while driving them to make more money.





MANUFACTURER SUSPICIOUS ORDER MONITORING PROGRAMS



SUSPICIOUS ORDER MONITORING "SOM"

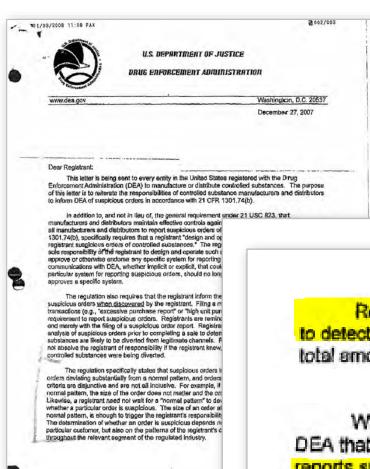


In 1970 Pres. Nixon signed into law the "Controlled Substances Act" (the "CSA")

Controlled Substances Act Title 21 U.S.C. 801(2)

The illegal importation, manufacture, distribution, and possession and improper use of controlled substances have a substantial and detrimental effect on the health and general welfare of the American people.

SUSPICIOUS ORDER MONITORING "SOM"



December 27, 2007 Letter

From: Joseph T. Rannazzisi, DEA

To: Every DEA Registered Manufacturer

Registrants that rely on rigid formulas to define whether an order is suspicious may be failing to detect suspicious orders. For example, a system that identifies orders as suspicious only if the total amount of a controlled substance ordered during one month exceeds the amount ordered the

When reporting an order as suspicious, registrants must be clear in their communications with DEA that the registrant is actually characterizing an order as suspicious. Daily, weekly, or monthly reports submitted by a registrant indicating "excessive purchases" do not comply with the requirement to report suspicious orders, even if the registrant calls such reports "suspicious order reports."

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THE EVIDENCE WILL SHOW THAT:

Dispensers Received Almost 9 Billion MME Of Opioids

Between 2006 and 2014, Dispensers in San Francisco County, CA received nearly **8.8 billion MME of opioids**.

Given the county's 809,711 population, Dispensers received **enough opioids for every resident** to consume **1,205 MME every year from 2006 to 2014**.

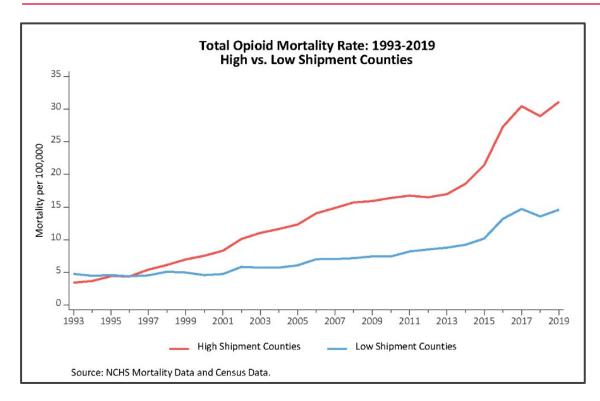
Manufacturer	Dosage Units
Actavis	92,131,690
Par	29,993,690
Teva (Generic)	10,533,535
Endo	5,696,320
Allergan	1,764,900
Cephalon (Branded)	157,694
Cephalon (Generic)	133,050
Teva (Branded)	28,174
Defendants Subtotal	140,439,053
Other Manufacturers	137,709,255
Total	278,148,308

HEALTH ECONOMIST EXPERT

Showed Defs' Causation Analysis is Irrelevant



David M. Cutler



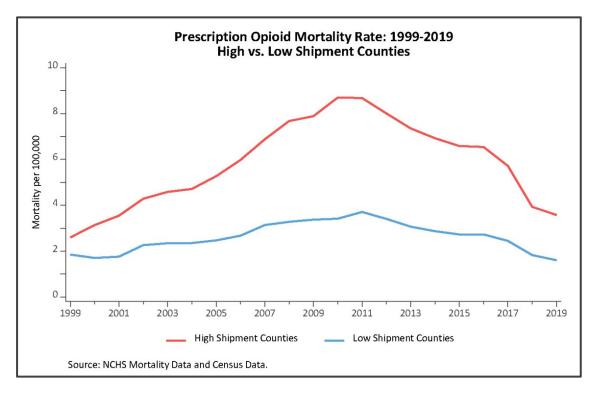
 Nationally, areas with more shipments experienced more opioid-related harms from 1993 – 2019

HEALTH ECONOMIST EXPERT

Showed Defs' Causation Analysis is Irrelevant



David M. Cutler



- Nationally, market for rx opioids changed dramatically in 2010 due to increased regulatory oversight, the release of the abuse deterrent opioids, and the reversal of 15 years of increasing shipments
- Nationally, these market changes decreased supply of rx opioids and increased the demand for illicit opioids

LEGAL CLAIMS

Public Nuisance

"A nuisance is "[a]nything which is **injurious to health**... or is indecent or offensive to the senses, or an obstruction to the free use of property, so as to interfere with the comfortable enjoyment of life or property...."

Cal. Civ. Code § 3479.

Public nuisances "affect[] at the same time an entire community or neighborhood, or any considerable number of persons"

Id. § 3480.

[The People] allege[] that Defendants' conduct created a public nuisance—the opioid epidemic—in San Francisco. FAC ¶¶ 223, 892–906."

Breyer, Mtd Order at 59.



Unfair Competition Law

Prohibits "unfair competition" defined as "any unlawful, unfair or fraudulent business act or practice and unfair, deceptive, untrue or misleading advertising"

Cal. Bus. & Prof. Code § 17200.

Three Prongs:

1. Unlawful

"Anything that can properly be called a business practice and that at the same time is forbidden by law."

- Violation of Controlled Substances Act requires defs to identify, report and halt suspicious orders and provide effective controls against diversion. 21 C.F.R. §§ 1301.71, 1301.74 and Cal. Bus. & Prof. Code §§ 4301 and 4164.
- Violation of Consumer Legal Remedies Act —
 prohibits "unfair methods of competition and
 unfair or deceptive acts or practices... intended
 to result or which result in the sale or lease of
 goods or services to any consumer."
 Cal Civil Code § 1770(a).

Unfair Competition Law

Prohibits "unfair competition" defined as "any unlawful, unfair or fraudulent business act or practice and unfair, deceptive, untrue or misleading advertising"

Cal. Bus. & Prof. Code § 17200.

Three Prongs:

2. Fraudulent

Likely to deceive members of the public. MTD Order at 80.

3. Unfair

Harm to the victim outweighs any benefit. MTD Order at 80.

SF'S PARK RANGERS HAVE COLLECTED THOUSANDS OF NEEDLES



Sergeant Maja Follin

SF Dept. of Recreation & Parks

- Recreation & Parks has a dozen outreach rangers
- They support homeless population in SF's Parks
- They encounter numerous overdoses
- They are trained to and frequently administer Narcan
- They are hazmat trained for safe needle pickup



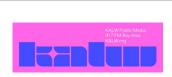
WORSENING EPIDEMIC REQUIRES SF STREET OVERDOSE RESPONSE TEAM ("SORT")



Sandy Tong

Assistant Deputy Fire Chief

- Worked with City of SF since 1989
- Observed the opioid epidemic worsen over the years
- Dramatic increase in Narcan administrations needed
- Dramatic increase in overdose deaths
- Street Overdose Team Created in 2021 to address overdose incidents on streets of SF



By Sunni Khalid August 3, 2021 at 3:44 PM PDT

Overdose Response Team Hits San Francisco Streets



This week, San Frar Team focused on re That includes dispensing buprenorphine, which is used to treat opioid addiction. They'll also provide rescue kits that contain the opioid-blocker Naloxone. They'll share educational materials, and help get folks into substance use treatment.

City officials say the calls and provide an immediate response from San Francisco Fire Department paramedics. The city's Department of Public Health will have its specialists provide follow-up services.

Robbins Geller Rudman & Dowd LLP

FOR WALGREENS

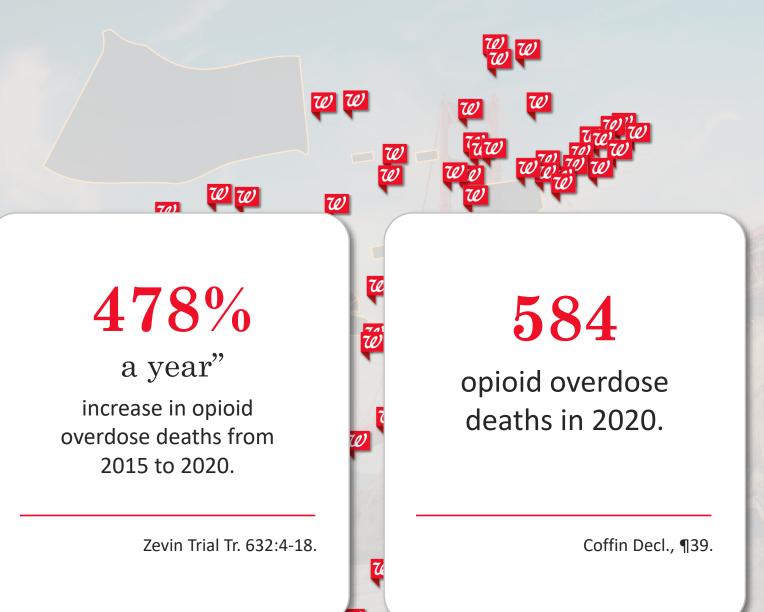
"Everything was about numbers, always"

Victor Lo, Trial Tr. 918:16-919:4

"86,904 opioid pills"

dispensed by Walgreens for Dr. Guido Gores after learning of his suspicious practices.

P-27532; P-28518_Gores_Excerpt; Trial Tr. 3052:10-3062:13.



FOR WALGREENS

"Everything was about numbers, always"

Victor Lo, Trial Tr. 918:16-919:4

"**2,998**

visits in 2020

(1,086) involved prescription opioids."

Coffin Decl. ¶40



"**7,600**

doses of Naloxone"

doses of Naloxone administered by SFFD "July 2018 and March 2022"

Tong Decl., ¶6.

"over

95,000

needles"

per year collected by DPW from 2017-2021.

Trial Tr. 1962:13-21.







CITY AND COUN' FRANCISCO, et al.

PURDUE PHARM.

The opioid epic of individuals who die

city residents, from al strained the city's hos

exacerbated crime and resources to a multipre

opioid epidemic. Citi

manufacturers, distrib

case vary, the claims

opioid epidemic that h

City Attorney ("Plaint

epidemic in San Franc

In this case, the

This case is par

Plaint

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FOR THE NORTHERN DISTRICT OF CALIFORNIA



diligence on hundreds of thousands of red flag prescriptions, many of which were written by suspicious prescribers that Walgreens' own pharmacists warned the company about. Based on the evidence presented at trial, it is unimaginable that many of the red flag prescriptions were not diverted. The aggregate evidence that Plaintiff presented at trial was not only adequate to establish Walgreens' culpability—it was devastating.

The Orange County and West Virginia Cases are Factually a. **Inapposite**

In two recent decisions involving the nationwide opioid litigation, two separate courts held that the plaintiffs in those cases failed to prove causation. In November 2021, after a multi-month bench trial, judgment was entered in favor of various opioid manufacturer defendants in the Superior Court of California County of Orange. People v.

NATIONAL SETTLEMENTS ACHIEVED AND NEXT STEPS IN LITIGATION

\$6.5 bil.



\$6 - 9 bil.



\$21 bil.

Big 3 Distributors





MCKESSON

\$1.6 bil.

\$450 mil.



\$5 bil.

Johnson Johnson

ON THE HORIZON

- Third Party Payor Litigation
- Additional Pharmacy Tracks (Walmart, Walgreens, CVS, etc.)