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Purdue Pharma L.P.*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

**In re:**

**PURDUE PHARMA L.P., et al.,  
  
Debtors.<sup>1</sup>**

**CREIGHTON BLOYD and CHARLES FITCH  
on behalf of themselves and others similarly situated  
to them,**

**Plaintiffs,**

**v.**

**PURDUE PHARMA L.P., WALMART INC.,  
and McKINSEY & CO.,**

**Defendants.**

**Chapter 11**

**Case No. 19-23649 (RDD)  
(Jointly Administered)**

**Adv. Pro. No. 20-07027 (RDD)**

**SECOND STIPULATION AND AGREED ORDER EXTENDING THE DEADLINE FOR  
DEFENDANTS TO ANSWER OR OTHERWISE RESPOND TO  
THE AMENDED COMPLAINT**

<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

This Second Stipulation and Agreed Order (the “**Second Stipulation and Order**”) is entered into by and among: (i) Debtor-Defendant Purdue Pharma L.P. (“**PPLP**”); (ii) Defendant Walmart Inc. (“**Walmart**”); (iii) Defendant McKinsey & Co. (“**McKinsey**”, together with PPLP and Walmart, the “**Defendants**”); and (iv) Plaintiffs Creighton Bloyd and Charles Fitch, the plaintiffs in the above-captioned adversary proceeding (the “**Plaintiffs**”) (together with the Defendants, “**Parties**” and each a “**Party**”).

**WHEREAS**, on December 10, 2020, Plaintiff Creighton Bloyd and non-party Stacey Bridges commenced this adversary proceeding by filing a complaint;

**WHEREAS**, on February 4, 2021, Plaintiffs filed an amended complaint (the “**Amended Complaint**”) in this adversary proceeding;

**WHEREAS**, on February 5, 2021, this Court issued a Second Summons and Notice of Pre-Trial Conference;

**WHEREAS**, under Rule 7012 of the Federal Rules of Bankruptcy Procedure, the deadline to respond to the Amended Complaint was March 8, 2021, for any Defendant duly served;

**WHEREAS**, on March 3, 2021, the Court approved the Stipulation and Agreed Order Extending the Deadline for Defendants to Answer or Otherwise Respond to the Amended Complaint, which extended Defendants’ time to answer, move, or otherwise respond to the Amended Complaint and established a briefing schedule and hearing schedule for any motions filed in response to the Amended Complaint [Adv. Pro. No. 20-07027, Dkt. No. 11];

**WHEREAS**, on March 15, 2021, the Debtors filed the Joint Chapter 11 Plan of Reorganization of Purdue Pharma L.P. and its Affiliated Debtors (the “**Plan**”) [Case No. 19-

23649, Dkt. No. 2487] and the Disclosure Statement for Chapter 11 Plan for Purdue Pharma L.P. and its Affiliated Debtors (the “**Disclosure Statement**”) [Case No. 19-23649, Dkt. No. 2488];

**WHEREAS**, in the interests of judicial economy and preserving resources of the estates of the Debtors, and in the interests of maintaining ongoing discussions between Plaintiffs and the Debtors regarding the Debtors’ Plan and Disclosure Statement and Plaintiffs’ claims in this adversary proceeding, the Parties have agreed to extend all Defendants’ time to answer, move, or otherwise respond to the Amended Complaint;

**NOW, THEREFORE**, the following is hereby stipulated and agreed to by the Parties, subject to the approval of the Court:

1. The deadline for each Defendant to answer or otherwise respond to the Amended Complaint is extended through and including May 7, 2021.

2. Defendants expressly reserve all rights and defenses they may possess.

3. The briefing schedule for any motion filed by any Defendant on or before May 7, 2021 in lieu of an answer to the Amended Complaint will be:

(a) Plaintiffs’ Brief in Opposition is due on or before May 28, 2021 at 4:00 pm (prevailing Eastern Time);

(b) Such Defendant’s Reply is due on or before June 11, 2021 at 4:00 pm (prevailing Eastern Time); and

(c) Any such motion will be heard at, and will be noticed for, the omnibus hearing in the above-captioned chapter 11 cases scheduled for June 16, 2021.

4. The initial Pre-Trial Conference in this adversary proceeding presently scheduled for June 16, 2021 at 10:00 am (prevailing Eastern Time) is adjourned to July 19, 2021 at 10:00 am (prevailing Eastern Time).

5. This Second Stipulation and Order may be executed in counterparts, and each counterpart, when so executed and delivered, shall be deemed an original, and all counterparts, taken together, shall constitute one and the same Stipulation and Order.

IN WITNESS WHEREOF, the Parties have executed this Second Stipulation and Order as of the date set forth below.

Dated: April 1, 2021  
New York, New York

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**SO ORDERED.**

Dated: April 2, 2021

White Plains, New York

/s/Robert D. Drain

THE HONORABLE ROBERT D. DRAIN  
UNITED STATES BANKRUPTCY JUDGE