

DAVIS POLK & WARDWELL LLP
450 Lexington Avenue
New York, New York 10017
Telephone: (212) 450-4000
Facsimile: (212) 701-5800
Marshall S. Huebner
Benjamin S. Kaminetzky
Timothy Graulich
Eli J. Vonnegut
Christopher S. Robertson

*Counsel to the Debtors
and Debtors in Possession*

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

In re:

**PURDUE PHARMA L.P., et al.,
Debtors.¹**

Chapter 11

Case No. 19-23649 (RDD)

(Jointly Administered)

AMENDED² AGENDA FOR JANUARY 24, 2020 OMNIBUS HEARING

Time and Date of Hearing: January 24, 2020 at 10:00 a.m. (prevailing Eastern Time)

Location of Hearing: The Honorable Judge Robert D. Drain
United States Bankruptcy Court for the Southern District of New York
300 Quarropas Street
White Plains, New York 10601

Copies of Motions: A copy of each pleading can be viewed on the Court's website at <http://www.nysb.uscourts.gov> and the website of the Debtors' notice and claims agent, Prime Clerk LLC at <https://restructuring.primeclerk.com/purduepharma>.

¹ 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.

² Amended items appear in bold text.

I. UNCONTESTED MATTER:

1. ***Exclusivity Extension Motion.*** Motion of Debtors for Entry of an Order Extending the Exclusive Periods within which to File a Chapter 11 Plan and Solicit Acceptances Thereof [ECF No. 734]

Objection Deadline: January 21, 2020 at 4:00 p.m. (prevailing Eastern Time).

Responses Received: None.

Related Documents: None.

Status: This matter is going forward on an uncontested basis.

II. CONTESTED MATTERS:

2. ***Claims Bar Date Motion.*** Debtors Motion for Entry of an Order (I) Establishing Deadlines for Filing of Proofs of Claim and Procedures Related Thereto, (II) Approving Proof of Claim Forms, and (III) Approving the Form and Manner of Notice Thereof [ECF No. 717]

Objection Deadline: January 17, 2020 at 4:00 p.m. (prevailing Eastern Time) (for all parties other than the Official Committee of Unsecured Creditors, the Ad Hoc Committee, the Ad Hoc Group of Non-Consenting States, the Multi-States Governmental Entities Group, the Ad Hoc Group of Hospitals and the United States Department of Justice with respect to whom the Objection Deadline was extended to January 21, 2020 at various times on or before 6:00 p.m. (prevailing Eastern Time))

Responses Received:

- A. Objection to Motion Limited Objection and/or Conditional Consent with Reservation of Rights of the NAS Children Ad Hoc Committee to Motion of Debtors for Entry of Order (i) Establishing Deadlines for Filing Proofs of Claim and Procedures Relating Thereto, (ii) Approving Proof of Claim Forms and (iii) Approving the Form and Manner Thereof [ECF No. 754]
- B. Statement and Reservation of Rights of the Official Committee of Unsecured Creditors in Respect of the Debtors' Motion for Entry of an Order (I) Establishing Deadlines for Filing of Proofs of Claim and Procedures Related Thereto, (II) Approving Proof of Claim Forms, and (III) Approving the Form and Manner of Notice Thereof [ECF No. 763]

- C. **Ad Hoc Committee’s Statement and Reservation of Rights in Response to Debtors Motion for Entry of an Order (I) Establishing Deadlines for Filing of Proofs of Claim and Procedures Relating Thereto, (II) Approving the Proof of Claim Forms, and (III) Approving the Form and Manner of Notice Thereof [ECF No. 772]**
- D. The Debtors have received informal responses from the Ad Hoc Committee, the Ad Hoc Group of Non-Consenting States, the Multi-States Governmental Entities Group, the Ad Hoc Group of Hospitals, and the United States Department of Justice.

Related Documents:

- A. Debtors’ Memorandum of Law in Support of Motion for Entry of an Order (I) Establishing Deadlines for Filing Proofs of Claim and Procedures Relating Thereto, (II) Approving the Proof of Claim Forms, and (III) Approving the Form and Manner of Notice Thereof [ECF No. 718]
- B. Declaration Pursuant to 28 U.S.C. § 1746 of Jeanne C. Finnegan [ECF No. 719]
- C. **Notice of Filing of Revised Proposed Order (I) Establishing Deadlines for Filing Proofs of Claim and Procedures Relating Thereto, (II) Approving the Proof of Claim Forms, and (III) Approving the Form and Manner of Notice Thereof [ECF No. 776]**

Status: This matter is going forward on a contested basis.

- 3. **Wages Motion.** Motion of Debtors for Entry of an Order Authorizing (I) Debtors to (A) Pay Prepetition Wages, Salaries, Employee Benefits and Other Compensation and (B) Maintain Employee Benefits Programs and Pay Related Administrative Obligations, (II) Employees and Retirees to Proceed with Outstanding Workers’ Compensation Claims and (III) Financial Institutions to Honor and Process Related Checks and Transfers [ECF No. 6]

Objection Deadline: October 3, 2019 at 4:00 p.m. (prevailing Eastern Time) (for all parties other than the Official Committee of Unsecured Creditors and the Ad Hoc Committee).

Responses Received:

- A. Objection of the United States Trustee to Motion of Debtors for Entry of Order Authorizing (I) Debtors to (A) Pay Pre-Petition Wages, Salaries, Employee Benefits and Other Compensation and (B) Maintain Employee Benefit Programs and Pay Related Administrative Obligations, (II) Employees and Retirees to Proceed with Outstanding Workers’ Compensation Claims and

(III) Financial Institutions to Honor and Process Related Checks and Transfers [ECF No. 134]

- B. Nevada Counties And Municipalities' Joinder to the Objection of the United States Trustee to Motion of Debtors for Entry of Order Authorizing (I) Debtors to (A) Pay Pre-Petition Wages, Salaries, Employee Benefits and Other Compensation and (B) Maintain Employee Benefit Programs and Pay Related Administrative Obligations, (II) Employees and Retirees to Proceed with Outstanding Workers' Compensation Claims and (III) Financial Institutions to Honor and Process Related Checks and Transfers [ECF No. 190]
- C. The Commonwealth of Pennsylvania's Joinder to the Objection of the United States Trustee to Motion of Debtors for Entry of Order Authorizing (I) Debtors to (A) Pay Pre-Petition Wages, Salaries, Employee Benefits and Other Compensation and (B) Maintain Employee Benefit Programs and Pay Related Administrative Obligations, (II) Employees and Retirees to Proceed with Outstanding Workers' Compensation Claims and (III) Financial Institutions to Honor and Process Related Checks and Transfers [ECF No. 196]
- D. Joinder/Objection by the Ad Hoc Group of Non-Consenting States to Motion of Debtors for Entry of Order Authorizing (I) Debtors to (A) Pay Pre-Petition Wages, Salaries, Employee Benefits and Other Compensation and (B) Maintain Employee Benefits Programs and Pay Related Administrative Obligations, (II) Employees and Retirees to Proceed with Outstanding Workers' Compensation Claims And (III) Financial Institutions to Honor and Process Related Checks And Transfers [ECF No. 197]
- E. Joinder of the State of Arizona to the Objection of the United States Trustee to Motion of Debtors for Entry of Order Authorizing (I) Debtors to (A) Pay Pre-Petition Wages, Salaries, Employee Benefits and Other Compensation and (B) Maintain Employee Benefit Programs and Pay Related Administrative Obligations, (II) Employees and Retirees to Proceed with Outstanding Workers' Compensation Claims and (III) Financial Institutions to Honor and Process Related Checks and Transfers [ECF No. 201]
- F. Letter of Linda A. Lacewell, Superintendent of New York State Department of Financial Services Re: Requested Payments to Purdue Pharma Employees [ECF No. 99]
- G. Letter of Dan Colucci Regarding Severance for Former Purdue Pharma L.P. Employees [ECF No. 103]

- H. Letter of John Taormina Regarding Former Employee Unemployment Benefits [ECF No. 327]
- I. Statement of the Ad Hoc Group of Non-Consenting States Maintaining Its Objection to Purdue's Wage Motion Insofar as It Relates to Purdue CEO Craig Landau [ECF No. 557]
- J. State of Maryland's Additional Statement With Respect to the Payment of Bonuses Under Debtors' Wage Motion to Any Recipient Who Participated in Debtors' Unlawful Conduct [ECF No. 559]
- K. The Ad Hoc Group of Non-Consenting States' Continuing Objection to Purdue's Wage Motion as it Relates to Purdue CEO Craig Landau and Response to the Debtors' Second Supplemental Reply [ECF No. 768]
- L. The Debtors have received informal responses from American Express National Bank, American Express Travel Related Services Company, Inc. and their affiliates, the Official Committee of Unsecured Creditors and the Ad Hoc Committee.

Reply:

- A. Debtors' Omnibus Reply in Support of Motion For Order Authorizing (I) Debtors to (A) Pay Pre-Petition Wages, Salaries, Employee Benefits and Other Compensation and (B) Maintain Employee Benefit Programs and Pay Related Administrative Obligations, (II) Employee and Retirees to Proceed with Outstanding Workers' Compensation Claims and (III) Financial Institutions to Honor and Process Related Checks and Transfers [ECF No. 235]
- B. Debtors' Supplemental Omnibus Reply in Support of Motion of Debtors for Entry of an Order Authorizing (I) Debtors to (A) Pay Pre-Petition Wages, Salaries, Employee Benefits and Other Compensation and (B) Maintain Employee Benefits Programs and Pay Related Administrative Obligations, (II) Employees and Retirees to Proceed with Outstanding Workers' Compensation Claims and (III) Financial Institutions to Honor and Process Related Checks and Transfers [ECF No. 556]
- C. Debtors' Second Supplemental Omnibus Reply in Support of Motion of Debtors for Entry of an Order Authorizing (I) Debtors to (A) Pay Pre-Petition Wages, Salaries, Employee Benefits and other Compensation and (B) Maintain Employee Benefits Programs and Pay Related Administrative Obligations, (II) Employees and

Retirees to Proceed with Outstanding Workers' Compensation Claims and (III) Financial Institutions to Honor and Process Related Checks and Transfers [ECF No. 758]

Related Documents:

- A. Interim Order Authorizing (I) Debtors to (A) Pay Prepetition Wages, Salaries, Employee Benefits and Other Compensation and (B) Maintain Employee Benefits Programs and Pay Related Administrative Obligations, (II) Employees and Retirees to Proceed with Outstanding Workers' Compensation Claims and (III) Financial Institutions to Honor and Process Related Checks and Transfers [ECF No. 62]
- B. Supplemental Declaration of Jon Lowne in Support of Motion For Order Authorizing (I) Debtors to (A) Pay Pre-Petition Wages, Salaries, Employee Benefits and Other Compensation and (B) Maintain Employee Benefit Programs and Pay Related Administrative Obligations, (II) Employee and Retirees to Proceed with Outstanding Workers' Compensation Claims and (III) Financial Institutions to Honor and Process Related Checks and Transfers [ECF No. 236]
- C. Notice of Filing of Revised Proposed Final Order Authorizing (I) Debtors to (A) Pay Prepetition Wages, Salaries, Employee Benefits and Other Compensation and (B) Maintain Employee Benefits Programs and Pay Related Administrative Obligations, (II) Employees and Retirees to Proceed with Outstanding Workers' Compensation Claims and (III) Financial Institutions to Honor and Process Related Checks and Transfers [ECF No. 256]
- D. Final Order Authorizing (1) Debtors to (A) Pay Prepetition Wages, Salaries, Employee Benefits and Other Compensation and (B) Maintain Employee Benefits Programs and Pay Related Administrative Obligations, (II) Employees and Retirees to Proceed with Outstanding Workers' Compensation Claims and; (III) Financial Institutions to Honor and Process Related Checks and Transfers [ECF No. 309]
- E. Notice of Adjournment of Certain Matters Scheduled for November 6, 2019 at 10:00 a.m. [ECF No. 344]
- F. Notice of Adjournment of Certain Matters Scheduled for November 19, 2019 at 2:00 p.m. [ECF No. 478]
- G. Second Supplemental Declaration of Jon Lowne in Support of Motion For Order Authorizing (I) Debtors to (A) Pay Pre-Petition

Wages, Salaries, Employee Benefits and Other Compensation and (B) Maintain Employee Benefit Programs and Pay Related Administrative Obligations, (II) Employee and Retirees to Proceed with Outstanding Workers' Compensation Claims and (III) Financial Institutions to Honor and Process Related Checks and Transfers [ECF No. 544]

H. Declaration of Josephine Gartrell in Support of Debtors' Key Employee Plans [ECF No. 555]

I. Supplemental Final Order Authorizing (1) Debtors to (A) Pay Prepetition Wages, Salaries, Employee Benefits and Other Compensation and (B) Maintain Employee Benefits Programs and Pay Related Administrative Obligations, (II) Employees and Retirees to Proceed with Outstanding Workers' Compensation Claims and; (III) Financial Institutions to Honor and Process Related Checks and Transfers [ECF No. 629]

Status: This matter is going forward on a contested basis.

4. ***TIG Specialty Insurance Stay Relief Motion.*** Motion for Relief from the Automatic Stay [ECF No. 712]

Objection Deadline: January 17, 2020 at 4:00 p.m. (prevailing Eastern Time).

Responses Received:

- A. Debtors' Objection to TIG's Motion for Relief from the Automatic Stay [ECF No. 753]
- B. Objection of the Official Committee of Unsecured Creditors to the Motion of Ironshore Specialty Insurance Company for Relief from Automatic Stay and Joinder to the Debtor's Objection to Such Motion [ECF No. 756]
- C. Ad Hoc Committees Statement in Support of Debtors Objection to TIGs Motion for Relief From the Automatic Stay [ECF No. 757]

Reply: Consolidated Reply in Support of Ironshore Specialty Insurance Company, Formerly Known as TIG Specialty Insurance Company's Motion for Relief from the Automatic Stay [ECF No. 765]

Related Documents:

- A. Memorandum of Law in Support of Motion for Relief from the Automatic Stay [ECF No. 712-1]
- B. Declaration of George Calhoun in Support of Motion for Relief from Automatic Stay [ECF No. 712-2]
- C. Declaration of Benjamin S. Kaminetzky in Support of Debtors' Objection to TIG's Motion for Relief from the Automatic Stay [ECF No. 755]

Status: This matter is going forward on a contested basis.

Dated: January 23, 2020
New York, New York

DAVIS POLK & WARDWELL LLP

By: /s/ Eli J. Vonnegut

450 Lexington Avenue
New York, New York 10017
Telephone: (212) 450-4000
Facsimile: (212) 701-5800
Marshall S. Huebner
Benjamin S. Kaminetzky
Timothy Graulich
Eli J. Vonnegut
Christopher S. Robertson

*Counsel to the Debtors
and Debtors in Possession*