

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

)	
)	Chapter 11
In re:)	
)	Case No. 19-23649 (RDD)
PURDUE PHARMA, L.P., et al.,¹)	
)	(Jointly Administered)
Debtors.)	
)	Objection Deadline: October 3, 2019
)	Hearing Date: October 10, 2019

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

To the Honorable Robert D. Drain, United States Bankruptcy Judge:

The Ad Hoc Group Of Non-Consenting States,² by and through its undersigned counsel, hereby objects to the *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*

¹ The Debtors in these chapter 11 cases, along with the last four digits of each of their federal tax identification number, as applicable, are Purdue Pharma Manufacturing L.P. (3821), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies K.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. (6166), 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' principal offices are located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

² The Ad Hoc Group of Non-Consenting States consists of: California, Colorado, Connecticut, Delaware, the District of Columbia, Hawaii, Idaho, Illinois, Iowa, Maine, Maryland, Massachusetts, Minnesota, Nevada, New Hampshire, New Jersey, New York, North Carolina, Oregon, Pennsylvania, Rhode Island, Vermont, Virginia, Washington and Wisconsin. For purposes of this Joinder, the Commonwealth of Pennsylvania is excluded because it is filing its own, separate joinder.

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 (the "Wage Motion") [ECF Doc. No. 6], by: (a) joining in the Objection of the United States Trustee to the Wage Motion (the "Objection") [ECF Doc. No. 134]; and (b) stating as follows:

1. The Court should deny the relief sought in the Wage Motion with respect to the Severance Program, Incentive Plans and Sign-on Bonuses (as defined in the Objection) for the reasons set forth in the Objection.

2. The Ad Hoc Group of Non-Consenting States adopts, incorporates and joins in the Objection, and the arguments made therein, as if fully set forth here.

Respectfully Submitted,

Dated: October 3, 2019

/s/ Andrew M. Troop
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CERTIFICATE OF SERVICE

The undersigned certifies that on October 3, 2019, a true and correct copy of this document was served by electronic mail through the Court's CM/ECF system to all parties who are deemed to have consented to electronic service.

/s/ Andrew M. Troop
PILLSBURY WINTHROP SHAW PITTMAN LLP