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## October 6, 2021

The Honorable Colleen McMahon United States District Court for the Southern District of New York The Hon. Charles L. Brieant Jr. Federal Building and United States Courthouse 300 Quarropas Street White Plains, NY 10601-4150

Re: In re: Purdue Pharma L.P., No. 7:21-cv-07532-CM (S.D.N.Y.); In re: Purdue Pharma L.P., No. 7:21-cv-07585-CM (S.D.N.Y.); In re: Purdue Pharma L.P., No. 7:21-cv-07961-CM (S.D.N.Y.); In re: Purdue Pharma L.P., No. 7:21-cv-07962-CM (S.D.N.Y.); In re: Purdue Pharma L.P., No. 7:21-cv-07966-CM (S.D.N.Y.); In re: Purdue Pharma L.P., No. 7:21-cv-08034-CM (S.D.N.Y.); In re: Purdue Pharma L.P., 7:21-cv-08042-CM (S.D.N.Y.); In re: Purdue Pharma L.P., 7:21-cv-08042-CM (S.D.N.Y.); In re: Purdue Pharma L.P., 7:21-cv-08042-CM (S.D.N.Y.); In re: Purdue Pharma L.P., 7:21-cv-08055-CM (S.D.N.Y.); In re: Purdue Pharma L.P., 7:21-cv-08055-CM (S.D.N.Y.); In re: Purdue Pharma L.P., 7:21-cv-08139-CM (S.D.N.Y.).

## Dear Judge McMahon:

We represent the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants (the "<u>Ad Hoc Committee</u>"), which consists of (i) ten States, (ii) the court-appointed Plaintiffs' Executive Committee in the multi-district litigation captioned *In re National Prescription Opiate Litigation*, Case No. 17-md-02804 (N.D. Ohio) (the "<u>MDL</u>") (iii) six counties, cites, parishes, or municipalities, and (iv) one federally recognized American Indian Tribe. We respectfully write to advise the Court and all parties of the Ad Hoc Committee's intent to participate as an appellee in the above-referenced appeals.

The appeals generally concern, among other things, the Bankruptcy Court's order confirming the joint chapter 11 plan (the "<u>Plan</u>") of Purdue Pharma L.P. and its affiliated debtors (the "<u>Debtors</u>"). Although Ad Hoc Committee was not identified as a party in the notices of appeal (and thus was not listed initially as an appellee on the various dockets), the Ad Hoc Committee was one of the primary litigants before the Bankruptcy Court. The Ad Hoc Committee represents the interests of the countless States, municipalities, and Tribes that support the Debtors' chapter 11 plan. Since its formation at the outset of the Debtors' bankruptcy, the Ad Hoc Committee has actively participated in all aspects of the cases, including chapter 11 plan negotiations and the Plan confirmation hearing, at which the Ad Hoc Committee presented six witnesses and submitted an 80-page brief. The Ad

The Honorable Colleen McMahon October 6, 2021



Hoc Committee's constituents, and the many other States, municipalities, and Tribes that support the Debtors' chapter 11 plan, are also the primary beneficiaries of the plan and the parties (together with the other creditor appellees) with the greatest interest in its success.

Accordingly, the Ad Hoc Committee intends to remain involved in all aspects of these cases, including the above-referenced appeals, and respectfully requests that it be added as an appellee on this Court's dockets.

Sincerely,

<u>/s/ Kenneth H. Eckstein</u> Kenneth H. Eckstein

CC: Melanie Cyganowski, Otterbourg, P.C. David Molton, Brown Rudnick LLP Scott Gilbert, Gilbert LLP