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REPLY TO: Miami

July 26, 2002

HAND DELIVERED

Jody Collins, Esq.
Assistant Attorney General
110 S. E. 6th St., 10th Floor
Ft. Lauderdale, FL 33301

RECEIVED

JUL 29 2002

Office of the Attorney General
Ft. Lauderdale / Economic Crime

Re: Purdue Pharma L.P.

Dear Ms. Collins:

With this letter I am providing Purdue's voluntary responses to the requests set out in the e-mail of June 24, 2002 from Assistant Attorney General David Aronberg.

1. **The names, titles and job descriptions for your sales personnel in Florida who supervised, trained, or otherwise informed physicians on the prescribing or use of OxyContin.**

Enclosed in File "A" is a list of names, addresses, telephone numbers, titles, and job descriptions for current and former Purdue sales personnel in Florida. **(Bates PP. 00001-00005.)**

With regard to Purdue's response to request number one, as well as the response to request number nine, we expressed our concern that providing home addresses and home telephone numbers has the potential for interference with personal privacy rights of employees and patients. Purdue has no objection to representatives of the Attorney General's Office or law enforcement contacting these individuals. Our concern is to protect these individuals from unnecessary harassment by people in the private sector who may have different agendas. I call this to your attention in order to urge you to be sensitive to Purdue's concern for the welfare of these employees. Notwithstanding, in the spirit of cooperation, we are providing you with the requested information.

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2. All marketing and launch for OxyContin, excluding the OxyContin Launch Plan dated September 27, 1995 previously produced to the Florida Attorney General.

We understand your request to seek marketing and launch plans for OxyContin. Enclosed in File "B" are copies of Purdue's marketing plans for OxyContin® for the years 1996-2002. We have redacted from those documents, information which was received from IMS Health, Inc. ("IMS"). Those redactions were made because Purdue is prohibited by its contract with IMS from disclosing that confidential information to third parties. We are prepared to discuss with you the feasibility of alternative ways of obtaining that information which will not violate Purdue's contractual provisions. (**Bates PP 00006-00352.**)

Regarding this response, please note Purdue has a legitimate concern about the possibility of its confidential marketing plans falling into the hands of business competitors. Notwithstanding this concern, Purdue is complying with your request. Regarding the redactions of IMS material, we have provided you with the name and telephone number of counsel for IMS. We encourage you to contact counsel for IMS in order to discuss with her the feasibility of alternate ways of obtaining this redacted information in a way which will not violate Purdue's contractual provisions. Purdue is prepared to assist in those discussions in order to facilitate the transmittal of the redacted material to you.

3. All documents relating to the commission, rebate, and bonus structure for your sales personnel relating to the sale of OxyContin.

Purdue's sales force incentive policies have been revised periodically as that program has been updated over time. Enclosed in File "C" are several different versions of Purdue's sales force Incentive Bonus Program. The company believes there may have been earlier versions of this Incentive Bonus Program since OxyContin was launched. The company is continuing to search for additional versions, which if located, will be produced to your office as soon as they are located. (**PP Bates 00353-00528.**)

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4. The names, addresses, phone numbers, titles, and job descriptions for your employees or independent contractors who authored, revised, or approved the text of your warning labels or package inserts for OxyContin.

Enclosed in File "D" is a list of names, current titles, and current job descriptions for Purdue's (1) personnel who authorized, revised, or approved the text of the original package insert for OxyContin® which was approved by the Food & Drug Administration on December 12, 1995; (2) Purdue's personnel who authored, revised or approved the text of the revised package insert for OxyContin® which was approved by the Food & Drug Administration on July 18, 2001; and (3) Purdue's personnel who authored, revised or approved the text of the patient package insert for OxyContin® which was approved by the Food & Drug Administration on January 16, 2002. All of these individuals, with the exception of James Conover, are still employees of Purdue. They can be reached at Purdue Pharma L.P., One Stamford Forum, Stamford, Connecticut 06901, telephone number 203-588-8000. The one individual no longer employed by Purdue is James Conover. The last address Purdue has in its records for Mr. Conover is [REDACTED]

5. A true copy of your publication entitled "A Guide to Your New Pain Medicine and How to Become a Partner Against Pain."

Enclosed in File "E" is a copy of a publication entitled "A Guide to Your New Pain Medicine and How to Become a Partner Against Pain." (PP Bates 00532-00542.)

6. Documents that show the revenue, sales, profits, and costs for OxyContin in United States dollars from January 1, 1996 to December 31, 1997.

Enclosed in File "F" is Purdue's response to this request. (PP Bates 00543.)

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7. E-mails relating to abuse-resistant narcotic pills, also known as "hard pills" or "smart pills."

As we discussed when we met on July 23, 2002, a literal compliance with this request would require a search of millions of e-mails. If you are able to narrow your request, such as to a small number of people or to a particular time frame, it might be more practical to comply. Purdue is willing to make available a technical person conversant with its e-mail system to work with you in order to provide you with those e-mails which are pertinent to your inquiry.

8. The abbreviation, code name, or company identifier for you in the "2000 Sales Force Effectiveness Study Compensation Report" published by the Hay Group Pharmaceutical Industry.

The company identifier is "AP."

- 9. For the video tape entitled "From One Pain Patient to Another."**
- a) All participants by physical description, name, address and telephone number.**
 - b) All persons involved in the filming production, scripting and promotion of the film.**
 - c) The dates of filming.**
 - d) The location where the filming took place.**
 - e) Any monies, fees, gifts or other arrangements for personal gain received by any or all of the individuals involved.**
 - f) The number of copies made of the film, and state how it was distributed.**

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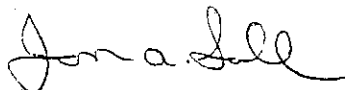
Enclosed in File "G" is Purdue's response to this request. As with the information provided in response to number one, we ask you to be sensitive to the privacy concerns of these individuals, particularly regarding the disclosure of their home addresses and telephone numbers. (PP Bates 00544-00546.)

When we met with Attorney General Butterworth and representatives of your office on June 12, 2002, we indicated it was Purdue's desire to cooperate with your office. I believe this document production is consistent with that commitment to cooperate. We look forward to continuing our discussions with you, regarding documents and other substantive issues, in a good faith effort to resolve this matter in a manner which is consistent with the interests of all parties concerned.

If you have any questions about the documents provided herein, please do not hesitate to call me.

Very truly yours,

SALE & KUEHNE, P.A.



Jon A. Sale

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Enclosures
cc: Cece Dykas, Esq.
Without Enclosures