

Co-Lead Counsel and Plaintiffs' Executive Committee,
In re: National Prescription Opiate Litigation, MDL 2804
purdue@pecmdl2804.com

June 18, 2020

To: All Counties, Cities, Municipalities, Other Local Governments, and Tribes in the United States

Re: Filing a Proof of Claim in the Purdue Bankruptcy

To whom it may concern:

We are co-lead counsel and members of the Plaintiffs' Executive Committee (PEC) in *In re: National Prescription Opiate Litigation*, Case No. 17-md-2804, multidistrict litigation (MDL) against opioid manufacturers, distributors, and retailers before Judge Dan A. Polster in the District Court for the Northern District of Ohio. Co-lead counsel and the PEC were appointed by Judge Polster to coordinate and conduct the litigation on behalf of all plaintiffs in suits transferred to the MDL.

We write to emphasize the importance of filing an individual Proof of Claim in *In Re Purdue Pharma, L.P., et al.*, Case No. 19-23649 (RDD) (Bankr. S.D.N.Y.) ("Purdue Bankruptcy Cases"), for any county, city, municipality, other local government, or Native American Tribe ("Government Entity") that believes it has a claim against Purdue Pharma, L.P. or its affiliated debtors (collectively, "Purdue"). **Filing an individual Proof of Claim is the best way to ensure that you will have a right to vote on any Chapter 11 plan(s) of reorganization put forth in the Purdue Bankruptcy Cases and to receive benefit of any funds generated by the Bankruptcy confirmation plan.** The Bankruptcy Court has indicated a very strong preference for the creation of prospective abatement programs versus cash distributions of what in the big scheme will not be a large dollar amount. You need not have filed litigation against Purdue or have retained counsel in order to have a claim against Purdue and file a Proof of Claim in the Purdue Bankruptcy Cases.

The deadline to file a Proof of Claim is July 30, 2020 at 5:00 p.m. Eastern Time. You can file an individual Proof of Claim online at <https://purduepharmaclaims.com/submitclaim.html>. Simply follow the directions at that web address to complete and submit a claim electronically. The web address also contains directions for downloading and submitting a hard copy Proof of Claim, if that is your preference. Choose the "Governmental Opioid Claimant Proof of Claim Form" option.

The Proof of Claim form asks for the amount of your claim against Purdue. To help you determine this amount, you can visit <https://purduelocalgovtclaims.info>, which has estimates of damages and abatement costs for most counties, cities, and other municipalities in the U.S. Follow the directions on the web page to see the estimate for your Government Entity. These estimates were developed by an economic expert at the request of the ad hoc committee of governmental and other contingent litigation claimants in the Purdue Bankruptcy Cases ("Ad Hoc Committee"). Please carefully read the Proof of Claim form and note that you, and only you, are responsible for the statements you make in your proof of claim.

Again, for a Government Entity holding claims against Purdue, submitting an **individual** Proof of Claim is vital to protecting your rights and the rights of all Government Entities asserting

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claims against Purdue. If you believe you have a claim against Purdue but, for whatever reason, do not wish to file an individual Proof of Claim, you should consider participating in the Consolidated Claim being facilitated by the Ad Hoc Committee. Instructions for how to participate in the Consolidated Claim, and conditions and limitations on participation, appear in the letter from Brown Rudnick LLP enclosed in this same mailing. If you file an individual Proof of Claim, you do not need to participate in the Consolidated Claim.

If you have questions about or need help completing an individual Proof of Claim, you can contact us at purdue@pecmdl2804.com. We will attempt to reply within 24 hours.

Sincerely,

All Co-Lead Counsel and Members of the Plaintiffs' Executive Committee,
In re: National Prescription Opiate Litigation, MDL 2804

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