

## **Brian Lee**

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**From:** Reid Martin <RMartin@martinwalkerlaw.com>  
**Sent:** Wednesday, October 20, 2021 4:46 PM  
**To:** Brian Lee  
**Cc:** Jack Walker; Malynda Carroll  
**Subject:** Titus County Opioid Litigation

### **Attorney-Client Privileged Communication**

Judge Williamson ,

Thank you for taking my call about the recent Opioid Settlement. As we discussed, we have negotiated a statewide settlement with Johnson & Johnson in the opioid litigation in conjunction with the Office of the Attorney General for the State of Texas. We are needing to obtain approval from the County. Based on our conversation, you will present this to Commissioners at your next scheduled meeting on Monday November 8, 2021. You had indicated that you will likely present this to the Commissioners in open session but I have included agenda language below that covers both Executive and Open session as follows

#### **Executive Session**

Discuss legal update and briefing regarding pending litigation, County of Titus vs. Purdue Pharma, L.P, et al Cause No. 2018-166; National Prescription Opiate Litigation, MDL 2804; Eastern Division, Northern District of Ohio and Master File Cause No. 2018-63587: In Re: Texas Opioid Litigation, in the 152<sup>nd</sup> District Court of Harris County, Texas.

#### **Open Session**

Consider and take necessary action to approve settlement agreement between Titus County and Johnson and Johnson, County of Titus vs. Purdue Pharma L.P., et al Cause No. 2018-166

The talking points that we discussed for the settlement:

- Replaces the global (national) settlement offer
- Guarantees the full amount in 2021
- Funding is controlled by Texas Courts, Texas Statute and the Texas Term Sheet as opposed to distribution from the Federal Court in Ohio
- Protected from future claims of Bankruptcy by J&J related to opioid liability
- Titus County: approximately \$32,750 directly to the county

This is a settlement with Johnson and Johnson only. We have outstanding claims against a number of defendants.

I will send you the proposed resolution language shortly. Please let me know if you have any questions or if I can be of any further help.

Thank you,

**Reid Wm. Martin**



The Arcadia Theater  
121 N. Spring Avenue  
Tyler, Texas 75702  
Direct (903) 526-1600  
Fax (903) 595-0796  
[rmartin@martinwalkerlaw.com](mailto:rmartin@martinwalkerlaw.com)



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