

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

IN RE NATIONAL PRESCRIPTION OPIATE
LITIGATION

This document relates to:
*The County of Summit, Ohio, et al. v. Purdue
Pharma L.P., et al.*
Case No. 18-op-45090

MDL No. 2804

Case No. 17-md-2804

Judge Dan Aaron Polster

**PLAINTIFFS' STATEMENT OF INTEREST IN RESPONSE TO PROPOSED CLASS
COUNSELS' AMENDED JOINT PROPOSED SCHEDULING ORDER AND
POSITIONS ON SCHEDULING**

The Plaintiffs' Executive Committee in MDL 2804 Leadership files a Statement of Interest regarding the above referenced motion. Dkt. No. 2691. We take no position on the proposed schedule submitted by the purported class counsel and defendants. However, we take strong objection to the "Plaintiffs' Position Statement" set out by proposed class counsel for the requested class of infants with neonatal abstinence syndrome ("NAS babies").

The plight of these children, the most vulnerable casualties of the opioid epidemic, has been front and center in each of the government cases. The government entities seek damages for the funds they have spent to treat these infants while hospitalized after birth and to keep them safe and healthy as they grow. Most importantly, as part of the abatement remedy, they outlined plans for needed programs to assist pregnant women who use opioids and to provide protective services and support to these children and their families. For example, Cuyahoga and Summit Counties submitted reports from two experts on neonatal abstinence and foster care, Dr. Scott Wexelblatt and Dr. Nancy Young, who describe in detail the toll that opioid use has taken on infants and children and the steps and funds required to assist them. Dkt. No. 1999-24 (Wexelblatt); Dkt. No. 1999-26 (Young).

As the Court is aware, in their recent settlements with Janssen, Summit and Cuyahoga Counties specifically negotiated funding that will be used for programs related to opioid-exposed babies. Both Counties will ramp up *Centering Pregnancy*, an evidence-based, group prenatal care program that has proven to lead to better health outcomes for babies and mothers and to decrease premature births. In its pilot phases, Centering Pregnancy has been shown to increase prenatal care, reduce neonatal intensive care unit admissions, increase gestational age, and improve birth weight, with a goal of reducing adverse health consequences for these children.

On behalf of the governmental plaintiffs in MDL 2804, we object to the characterization by purported class counsel in this filing.

Dated: October 3, 2019

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, Abigail Fu, hereby certify that on October 3, 2019, I electronically filed the foregoing with the Clerk of Court using the CM/ECF System. The foregoing will be electronically served on counsel of record registered with the CM/ECF System.

/s/ Abigail Fu