

IN THE SUPREME COURT OF THE STATE OF NEVADA

TEVA PHARMACEUTICALS USA, INC.,
MCKESSON CORPORATION,
AMERISOURCEBERGEN DRUG
CORPORATION, CARDINAL HEALTH, INC.,
CARDINAL HEALTH 6 INC., CARDINAL
HEALTH TECHNOLOGIES LLC, CARDINAL
HEALTH 108 LLC d/b/a METRO MEDICAL
SUPPLY, CEPHALON, INC., ENDO HEALTH
SOLUTIONS INC., ENDO PHARMACEUTICALS
INC., ALLERGAN USA, INC., ALLERGAN
FINANCE, LLC f/k/a ACTAVIS, INC. f/k/a
WATSON PHARMACEUTICALS, INC.,
WATSON LABORATORIES, INC., ACTAVIS
PHARMA, INC. f/k/a WATSON PHARMA, INC.,
ACTAVIS LLC, and MALLINCKRODT, LLC,

Petitioners,

v.

SECOND JUDICIAL DISTRICT COURT OF THE
STATE OF NEVADA, in and for the County of
Washoe, and the HONORABLE BARRY L.
BRESLOW, DISTRICT JUDGE,

Respondents,

and

CITY OF RENO,

Real Party in Interest.

Supreme Court Case No.

81121

Electronically Filed
Sep 18 2020 01:10 p.m.
District Court Case No.
CV18-01895 of Supreme Court

**NOTICE OF SUPPLEMENTAL DEVELOPMENTS
REGARDING PETITION FOR WRIT OF MANDAMUS**

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Pursuant to Nevada Rule of Appellate Procedure 31(e), Petitioners respectfully submit this notice to call to the Court's attention recent developments that bear directly on issues raised in this matter.

After Petitioners filed their reply brief in this writ proceeding on July 23, 2020, the private law firm representing the City of Reno filed fourteen more opioid-related lawsuits on behalf of Nevada political subdivisions:

- **(1)** *Washoe County v. Teva Pharmaceuticals USA, Inc. et al.*, Case No. CV20-01142 (Second Jud. Dist. Ct. for Washoe County) (filed July 24, 2020).
- **(2)** *Lincoln County v. Teva Pharmaceuticals USA, Inc. et al.*, Case No. CV 0702620 (Seventh Jud. Dist. Ct. for Lincoln County) (filed July 28, 2020).
- **(3)** *Mineral County v. Teva Pharmaceuticals USA, Inc. et al.*, Case No. 21CV-TT12-2020-0104 (Eleventh Jud. Dist. Ct. for Mineral County) (filed July 28, 2020).
- **(4)** *City of Sparks v. Teva Pharmaceuticals USA, Inc. et al.*, Case No. CV20-01152 (Second Jud. Dist. Ct. for Washoe County) (filed July 28, 2020).
- **(5)** *Carson City v. Teva Pharmaceuticals USA, Inc. et al.*, Case No. 20 TRT 000471B (First. Jud. Dist. Ct. for Carson City) (filed July 29, 2020).
- **(6)** *Churchill County v. Teva Pharmaceuticals USA, Inc. et al.*, Case No. 20-10DC-0805 (Tenth Jud. Dist. Ct. for Churchill County) (filed July 29, 2020).
- **(7)** *Douglas County v. Teva Pharmaceuticals USA, Inc. et al.*, Case No. 2020 CV 00139 (Ninth Jud. Dist. Ct. for Douglas County) (filed July 29, 2020).
- **(8)** *Esmeralda County v. Teva Pharmaceuticals USA, Inc. et al.*, Case No. CV 20-5117 (Fifth Jud. Dist. Ct. for Esmeralda County) (filed July 29, 2020).
- **(9)** *Humboldt County v. Teva Pharmaceuticals USA, Inc. et al.*, Case No. CV0022306 (Sixth Jud. Dist. Ct. for Humboldt County) (filed July 29, 2020).

- **(10)** *Lyon County et al. v. Teva Pharmaceuticals USA, Inc. et al.*, Case No. 20-CV-00795 (Third Jud. Dist. Ct. for Lyon County) (filed July 30, 2020).
- **(11)** *White Pine County v. Teva Pharmaceuticals USA, Inc. et al.*, Case No. CV-2007076 (Seventh Jud. Dist. Ct. for White Pine County) (filed July 30, 2020).
- **(12)** *City of West Wendover v. Teva Pharmaceuticals USA, Inc. et al.*, Case No. DC-CV-20-70 (Fourth Jud. Dist. Ct. for Elko County) (filed July 30, 2020).
- **(13)** *City of Fernley v. Teva Pharmaceuticals USA, Inc. et al.*, Case No. 20-CV-00796 (Third Jud. Dist. Ct. for Lyon County) (filed July 30, 2020).
- **(14)** *City of Ely v. Teva Pharmaceuticals USA, Inc. et al.*, Case No. CV-2007077 (Seventh Jud. Dist. Ct. for White Pine County) (filed July 30, 2020).

See Mack v. Estate of Mack, 125 Nev. 80, 92, 206 P.3d 98, 106 (2009) (“We have taken judicial notice of other state court . . . proceedings when a valid reason presented itself.” (citations omitted)).

These newly filed actions are relevant to the Dillon's Rule issues raised in this writ proceeding. See Pet. at 15-20, 23-24; Reply Br. at 13-15.

RESPECTFULLY SUBMITTED this 18th day of September, 2020.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of McDonald Carano LLP, and that on this 18th day of September, 2020, a copy of the foregoing Notice of Supplemental Developments Regarding Petition for Writ of Mandamus was electronically filed with the Clerk of the Court for the Nevada Supreme Court by using the Nevada Supreme Court's E-Filing system (Eflex) and served via U.S. Mail, postage prepaid, on the following individuals:

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In addition, in compliance with NRAP 21(a)(1) and Administrative Order 2020-05, a copy of this Notice of Supplemental Developments Regarding Petition for Writ of Mandamus was served upon the Honorable Barry Breslow, District Judge via electronic service and email to Christine.Kuhl@washoecourts.us.

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