

July 20, 2025

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

**PURDUE PHARMA L.P., et al.,
Debtors**

Chapter 11

CASE NO. 19-23649

**NOTICE OF APPEARANCE AND INTENT TO PROVIDE EXPERT TESTIMONY FROM
CLAIMANT [REDACTED]**

To the Honorable Court:

My name is [REDACTED] and I am an Individual claimant in this matter. I am writing to formally give notice of my intent to provide **expert testimony** based on both **my previous work experience in institutional pharmaceutical settings** and **my personal experience as a long-term patient prescribed opioids and other drugs**. My testimony speaks directly to the failures in how these drugs were packaged and dispensed — and the predictable harm that resulted. I bring a unique perspective to this case because in my previous work experience, I saw firsthand how packaging **exposed diversion** and improved accountability within the healthcare system.

Negligent Packaging: A Preventable and Ongoing Failure

It is my firm belief that it was **negligent for pharmaceutical companies to manufacture and dispense powerful opioids in bulk bottles** — especially to patients already suffering from severe or chronic pain and the predictable cognitive impairment from them. In hospitals and care facilities, narcotics are usually dispensed in **unit-dose packaging** for a reason: it helps reduce confusion, track consumption, limit diversion, and protect patients from harm and reduces the risk of taint.

But at the retail level, patients like me, who were already overwhelmed by pain and the mind-altering effects of opioids — were sent home with **bottles full of loose pills** and expected to manage their consumption, while experiencing the side-effects of them. This practice **completely ignored the known side effects of opioids**: memory loss, brain fog, slowed decision-making, and impaired coordination. Not to mention how the combination with other prescribed medication magnified the effects and made everything worse.

When you're in pain and mentally dulled by the very drugs you've been prescribed, it is **not reasonable or safe to expect patients to properly manage the administration and consumption, without the aid of safe packaging**. These were not vitamins or over-the-counter drugs — they were **narcotics with high abuse potential and life-altering consequences**, and yet they were handed out as if they were harmless.

Had I received these drugs in **patient-friendly, unit-dose packaging** — like those used in institutional setting — I believe much of the confusion and harm I experienced could have been reduced. **This lack of safety was a fundamental failure in duty of care**, one that continues to put millions of patients at risk. It is compounding the harm, in my opinion, if this ongoing failure is not addressed here, by this court.

Settlement's Abatement Goal

If the goal of this settlement is truly to bring **an abatement** to the opioid crisis, then the Court must look beyond financial payouts and address the **structural failures** that allowed this crisis to happen in the first place. That includes the reckless and negligent decision to package high-risk narcotics in bulk — with no regard for how vulnerable patients actually live, think, or function under the influence of these drugs.

I urge the Court to use this opportunity to require that **opioids (and all narcotics) be manufactured in patient-friendly unit-dose packaging going forward**. This simple change would save lives, prevent misuse, reduce diversion/taint, and help ensure patients like me are never put in this situation again.

Conclusion

I respectfully submit this Notice as a survivor and as someone with both lived experience consuming prescribed opioids and work experience, before the introduction of Retail Pain Management. I offer my testimony in the hope that the Court will listen — not just to the legal arguments, but to the lived truth of those who were harmed.

The damage to individual lives is permanent. But if this Court acknowledges the role that negligent packaging played in this national crisis, and mandates the Pharmaceutical Industry to correct it, en masse, similar tragedies can be prevented from repeating.

Respectfully submitted,

A black rectangular redaction mark covering the signature of the submitter.

CERTIFICATE OF SERVICE

I [REDACTED], a Pro Se Claimant, certifies that the above referenced document and associated attachments were presented by email on July 20, 2025, to the following:

Debtors' Counsel

- **Davis Polk & Wardwell LLP**

450 Lexington Avenue
New York, NY 10017
<https://www.davispolk.com/>
Phone: 212.450.4000
Fax: 212.701.5800
Marshall S. Huebner
Timothy Graulich
Eli J. Vonnegut

- **United States Trustee**

U.S. Federal Office Building
201 Varick Street, Suite 1006
New York, NY 10014
<https://www.justice.gov/ust-regions-r02>
Phone: 212.510.0500
Fax: 212.668.2255

- **United States Bankruptcy Court**

Southern District of New York
300 Quarropas Street
White Plains, NY 10601-4140
<http://www.nysb.uscourts.gov>
Phone: 212.668.5637

- **Akin Gump Strauss Hauer & Feld LLP**

One Bryant Park

New York, NY 10036

<https://www.akingump.com/en/>

Phone: 212.872.1000

Fax: 212.872.1002

Arik Preis

apreis@akingump.com