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

IN RE SUBOXONE)	Case No. 1:24-md-03092
(BUPRENORPHINE/NALOXONE))	
PRODUCTS LIABILITY LITIGATION)	MDL No. 3092
This Document Relates to All Cases)	Judge J. Philip Calabrese

Defendants' Report on Record Collection

Pursuant to ECF #207, Page ID #5679, Defendants submit this report on

progress toward completing records collection for the Records Collection Pool. As of

June 12, 2025, for the Record Collection Pool Plaintiffs:

- 1. The below figures at 1(a) & (b) were provided by Rubris:
 - (a) 68 Plaintiffs have submitted authorizations only.
 - (b) 124 Plaintiffs have submitted both authorizations and Census Forms.
- 2. Record requests have been sent to 847 providers.
- 3. Records collection is complete for 0 (zero) Plaintiffs.
- 4. Defendants have produced 867 record sets via Crosslink.
- 5. Defendants have encountered limited issues relating to healthcare noncompliance with Case Management Order No. 13. Certain facilities are maintaining the position that the authorization provided fails to comply with 42 C.F.R. Part 2 ("Confidentiality of Substance Use Disorder Patient Records"), and that they therefore cannot release substance use disorder records despite the terms of CMO 13. Certain facilities are refusing to accept an electronic signature and will only honor an authorization with a wet signature. Defense counsel is working with Plaintiffs' counsel to obtain wet signatures and is working with its vendor to determine a solution to the remaining issues.

Dated: June 13, 2025

Respectfully submitted,

BOWMAN AND BROOKE LLP

By: <u>/s/ Randall L. Christian</u> Randall L. Christian

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Attorneys for Defendants Indivior Inc., Indivior Solutions Inc., and Aquestive Therapeutics, Inc.

CERTIFICATE OF SERVICE

Per Appendix B, ¶ 14 of the Northern District of Ohio's Electronic Filing Policies and Procedures Manual, I hereby certify that on June 13, 2025, the foregoing *Defendants' Report on Record Collection* was electronically filed with the Clerk of Court using the CM/ECF system, and notice of this filing will be electronically transmitted to all counsel of record by operation of the Court's electronic filing system.

<u>/s/ Randall L. Christian</u> Randall L. Christian