

**RESOLUTION OF THE BOARD OF SUPERVISORS OF THE  
COUNTY OF SANTA BARBARA, STATE OF CALIFORNIA**

**IN THE MATTER OF AUTHORIZING  
PARTIAL SETTLEMENT OF THE  
LAWSUIT FILED ON BEHALF OF THE  
COUNTY OF SANTA BARBARA AND  
THE PEOPLE OF CALIFORNIA  
AGAINST PRESCRIPTION OPIOID  
DISTRIBUTORS AND  
MANUFACTURERS, ACCEPTANCE OF  
FUNDS THROUGH THE CALIFORNIA  
STATE ALLOCATION AGREEMENT**

**RESOLUTION NO. 26-98**

**WHEREAS**, on December 11, 2018, the Santa Barbara County Board of Supervisors (Board of Supervisors) approved and authorized the Office of County Counsel to initiate litigation against distributors and manufacturers of prescription opioids, to recover the County’s damages from opioid drug misuse caused by the deceptive marketing and sale of prescription opioids, and to obtain other remedies to mitigate this issue going forward;

**WHEREAS**, on January 8, 2019, the Board of Supervisors approved and authorized the contingent-fee outside counsel agreement with the law firm of Keller Rohrback, L.L.P. to assist with this litigation;

**WHEREAS**, on February 15, 2019, the Office of County Counsel with the assistance of Keller Rohrback filed litigation on behalf of the County and in the name of the People of California in the United States District Court for the Central District of California, which was consolidated into the nationwide Multi-District Litigation in the United States District Court for the Northern District of Ohio (Case No. 1:17-MD-2804). Defendants in the lawsuit include Purdue Pharma, L.P.; Purdue Pharma, Inc.; The Purdue Frederick Company, Inc.; Endo Health Solutions Inc.; Endo Pharmaceuticals, Inc.; Janssen Pharmaceuticals, Inc.; Johnson & Johnson; Teva Pharmaceuticals Industries, Ltd.; Teva Pharmaceuticals USA, Inc.; Cephalon, Inc.; Allergan PLC f/k/a Actavis PLC; Allergan Finance, LLC f/k/a Actavis, Inc. f/k/a Watson Pharmaceuticals, Inc.; Watson Laboratories, Inc.; Actavis LLC; Actavis Pharma, Inc. f/k/a Watson Pharma, Inc.; Mallinckrodt plc; Mallinckrodt, LLC; SpecGX LLC; Cardinal Health, Inc.; McKesson Corporation; AmerisourceBergen Drug Corporation; Par Pharmaceutical Companies, Inc.; Par Pharmaceutical, Inc.; Mylan Pharmaceuticals, Inc.; West-Ward Pharmaceutical Corp.; Hikma Pharmaceuticals PLC; Walgreens Boots Alliance Inc. a/k/a Walgreen Co; Thrifty Payless, Inc.; Rite Aid Corporation; Richard S. Sackler; Jonathan D. Sackler; Mortimer D.A. Sackler; Kathe A. Sackler; Ilene Sackler Lefcourt; Beverly Sackler; Theresa Sackler; David A. Sackler; Trust for the Benefit of Members of the Raymond Sackler Family; Rhodes Pharmaceuticals L.P.; Rhodes Technologies Inc.; Rhodes Pharmaceuticals Inc.; Rhodes Technologies; Walmart, Inc.; CVS Health Corporation; CVS Pharmacy Inc.; and CVS RX Services, Inc.; Does 1 through 100, inclusive (the “lawsuit”);

**WHEREAS**, the lawsuit alleges, *inter alia*, that defendants created a public nuisance, and violated the California Unfair Competition and the False Advertising laws by distributing large volumes of opioids in Santa Barbara County despite knowledge of the growing epidemic caused by opioid

misuse, and by failing to prevent and report suspicious opioid orders as required by State and Federal law;

**WHEREAS**, on December 14, 2021, the Board of Supervisors adopted a Resolution to partially settle the lawsuit with opioid manufacturers and distributors Amerisource Bergen Corporation, Cardinal Health, Inc., McKesson Corporation, and Janssen Pharmaceuticals, doing business as Johnson & Johnson;

**WHEREAS**, on April 4, 2023, the Board of Supervisors adopted a Resolution to partially settle the lawsuit with pharmacy chains CVS Health Corporation and CVS Pharmacy, Inc., Walgreens Co., and Walmart Inc., along with opioid manufacturers Allergan Finance LLC (f/k/a Actavis, Inc., f/k/a Watson Pharmaceuticals, Inc.) and Allergan Limited (f/k/a Allergan plc, f/k/a Actavis plc), and Teva Pharmaceutical Industries Ltd. Inclusive of Teva Pharmaceuticals USA, Inc., the Actavis Generic Entities, and Anda Inc.;

**WHEREAS**, on July 16, 2024, the Board of Supervisors adopted a Resolution to partially settle the lawsuit with supermarket pharmacy The Kroger Co (Kroger);

**WHEREAS**, on September 23, 2025, the Board of Supervisors adopted a Resolution to partially settle the lawsuit with opioid manufacturers Purdue Pharma and the Sackler family and a Resolution to partially settle the lawsuit with secondary manufacturers Alvogen, Inc., Amneal Pharmaceuticals, Inc., Apotex Inc., Hikma Pharmaceuticals USA Inc., Indivior Inc., Mylan Pharmaceuticals Inc., Sun Pharmaceutical Industries, Inc., and Zydus Pharmaceuticals (USA), Inc. (collectively, “the G8” settlements);

**WHEREAS**, in early 2026, Associated Pharmacies, Inc. (and American Associated Pharmacies), J M Smith Corporation, Louisiana Wholesale Drug Company, Inc., Morris and Dickson Co., North Carolina Mutual Wholesale Drug Company, Inc., and United Natural Foods Inc. including its subsidiaries SuperValu and Advantage Logistics (collectively, the “Remnant Defendants”) offered to settle the opioid lawsuits against them and counsel recommended accepting the offer to settle;

**WHEREAS**, the County of Santa Barbara is estimated to receive up to approximately \$106,000.00 from the Remnant Defendants Settlement;

**WHEREAS**, in order for the County to receive these funds, it must elect to participate in the Remnant Defendants Settlement through execution of the Combined Subdivision Participation and Release Form by May 4, 2026;

**WHEREAS**, the Remnant Defendants Settlement Agreement requires that the settlement funds be used for approved opioid abatement activities. As a litigating subdivision, the County of Santa Barbara may also use a portion of the settlement funds received for in-house and outside counsel attorneys’ fees and costs; and

**WHEREAS**, upon execution of the Combined Subdivision Participation and Release form, the County of Santa Barbara covenants not to bring, file, or claim, or to cause, assist or permit to be brought, filed, or claimed, or to otherwise seek to establish liability against the six Remnant Defendants for each’s conduct complained of in the lawsuit.

**NOW, THEREFORE, IT IS HEREBY ORDERED AND RESOLVED**

The Board of Supervisors for the County of Santa Barbara approves and authorizes County Counsel or her designee to execute the following documents by May 4, 2026, which shall partially settle the action *County of Santa Barbara and the People of the State of California v. Purdue Pharma, et al.* (Case No. 1:17-MD-2804):

1. The Combined Subdivision Participation and Release Form for the Remnant Defendants Settlement, execution of which shall release all claims against the six Remnant Defendants for each's conduct complained of in the lawsuit.

PASSED, APPROVED, AND ADOPTED by the Board of Supervisors of the County Santa Barbara, State of California, on this 21st day of April, 2026 by the following vote:

**AYES:** Supervisors Lee, Capps, Hartmann, Nelson and Lavagnino

**NAYS:** None

**ABSENT:** None


**ABSTAIN:** None

ATTEST:

MONA MIYASATO  
COUNTY EXECUTIVE OFFICER  
CLERK OF THE BOARD

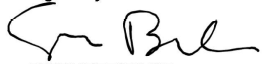
COUNTY OF SANTA BARBARA


Signed by:  
  
 By: 0B03F3DDF9EE4AA...  
 Deputy Clerk

Signed by:  
  
 By: 9DD6B7A21FC646A...  
 Bob Nelson, Chair  
 Board of Supervisors

RECOMMENDED FOR APPROVAL  
AND APPROVED AS TO FORM:  
RACHEL VAN MULLEM  
COUNTY COUNSEL

APPROVED AS TO ACCOUNTING  
FORM:  
BETSY M. SCHAFFER, CPA  
AUDITOR-CONTROLLER

Signed by:  
  
 By: 7C2B92D7E3BC48F...  
 Deputy County Counsel

Signed by:  
  
 By: A99ED08D71D047B...  
 Deputy Auditor-Controller