Mayor and City Council of Baltimore v. Purdue Pharma L.P., *et al.*
No. 24-C-18-515
Circuit Court for Baltimore City

ADDENDUM TO MEMORANDUM OPINION ON ABATEMENT REMEDY

SUMMARY — Page 1

$ millions

CATEGORY/ITEM	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	TOTAL
TOTAL HARM REDUCTION	31.140	30.950	31.600	32.150	32.850	33.300	34.150	34.950	35.651	37.201	333.944
TOTAL TREATMENT & RECOVERY	17.270	25.420	29.620	34.120	38.370	40.620	40.470	38.620	36.120	33.820	334.450
TOTAL EDUCATION	0.500	0.500	0.500	0.500	0.500	0.500	0.500	0.500	0.500	0.500	5.000
TOTAL SPECIAL POPULATIONS	6.290	6.640	6.990	6.990	7.240	7.530	7.290	6.790	6.590	6.440	68.790
TOTAL MONITORING	1.250	1.300	1.300	1.300	1.400	1.450	1.550	1.550	1.600	1.600	14.300
TOTALS	56.450	64.810	70.010	75.060	80.360	83.400	83.960	82.410	80.461	79.561	756.484
Future Damages Adjustment	-1.250	-1.250	-1.275	-1.300	-1.300	0.000	0.000	0.000	0.000	0.000	
Adjustment	55.200	63.560	68.735	73.760	79.060	83.400	83.960	82.410	80.461	79.561	750.109
"Saloner" Factor	0.835	0.830	0.825	0.820	0.815	0.811	0.806	0.801	0.796	0.791	
Adjustment	46.092	52.755	56.707	60.483	64.434	67.638	67.672	66.011	64.047	62.932	608.771
Apportionment Factor	0.1992	0.1992	0.1992	0.1992	0.1992	0.1992	0.1992	0.1992	0.1992	0.1992	
Adjustment	9.182	10.509	11.296	12.048	12.835	13.473	13.480	13.149	12.758	12.536	121.267
Present Value	9.182	10.089	10.41	10.659	10.901	10.986	10.552	9.881	9.203	8.682	100.545

Mayor and City Council of Baltimore v. Purdue Pharma L.P., *et al.*
No. 24-C-18-515
Circuit Court for Baltimore City

ADDENDUM TO MEMORANDUM OPINION ON ABATEMENT REMEDY

Category 1: HARM REDUCTION — Page 2

$ millions

CATEGORY/ITEM	PADULA REFERENCE	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	TOTAL
Naloxone Distrib & Training												
Naloxone for first responders	1.A.i.3	0.4	0.4	0.4	0.3	0.3	0.3	0.3	0.3	0.3	0.3	3.3
Naloxone for high-risk individuals	1.A.i.5											
Take-home kits		0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2	2
Nasal spray		1.3	1.3	1.2	1.2	1.2	1.1	1.1	1.1	1	1	11.5
Naloxone public lock boxes	1.A.i.6											
Public lock boxes		0.2	0.0003	0.0003	0.0003	0.0004	0.0004	0.0004	0.0004	0.0005	0.0005	0.2035
Naloxone supply		0.4	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2	2.2
Syringe Service Programs (SSPs)	1.A.ii.1	1.6	1.7	1.7	1.7	1.7	1.6	1.7	1.7	1.7	1.7	16.8
Syringe and Paraphernalia Disposal	1.A.iv.1	0.04	0	0	0	0	0	0	0	0	0	0.04
Drug Checking												
Drug checking machines	1.A.v.1											
Machines		0.5	0	0	0	0	0	0	0	0	0.7	1.2
Technicians		0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	1
Drug testing strips	1.A.v.2	2.2	2.25	2.3	2.25	2.25	2.2	2.25	2.25	2.25	2.3	22.5
Drop-In & Stabilization Centers												
Drop-in centers	1.A.viii.1	16.1	16.5	16.9	17.4	17.9	18.3	18.8	19.3	19.9	20.4	181.5
Drug stabilization & health centers	1.A.viii.2	8	8.2	8.5	8.7	8.9	9.2	9.4	9.7	9.9	10.2	90.7
Street Outreach	1.A.ix.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	1
TOTAL HARM REDUCTION		31.140	30.950	31.600	32.150	32.850	33.300	34.150	34.950	35.651	37.201	333.944

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No. 24-C-18-515
Circuit Court for Baltimore City

ADDENDUM TO MEMORANDUM OPINION ON ABATEMENT REMEDY

Category 2: TREATMENT AND RECOVERY — Page 3

$ millions

CATEGORY/ITEM	PADULA REFERENCE	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	TOTAL
Connecting Individuals to Care	2.B											
Helplines	2.B.1	0.4	0.4	0.4	0.4	0.4	0.5	0.5	0.5	0.5	0.5	4.5
ED Bridge Programs	2.B.2	0.2	0.2	0.2	0.2	0.2	0.25	0.25	0.25	0.25	0.25	2.25
Overdose Response Teams	2.B.4											
Addiction counselors		0.5	0.5	0.5	0.4	0.4	0.4	0.3	0.3	0.3	0.3	3.9
First responders		0.4	0.4	0.4	0.4	0.3	0.3	0.3	0.3	0.2	0.2	3.2
Peer support specialists		0.4	0.4	0.4	0.3	0.3	0.3	0.3	0.2	0.2	0.2	3
Wrap-Around Services/General	2.C											
Transportation assistance	2.C.1	0.3	0.4	0.5	0.6	0.6	0.7	0.7	0.7	0.6	0.6	5.7
Assertive Community Treatment	2.C.4											
ACT team leaders		0.4	1	1.2	1.4	1.5	1.6	1.6	1.5	1.4	1.3	12.9
Psychiatrists		2	4.4	5.2	6	6.9	7.3	7.2	6.8	6.3	5.7	57.8
Psychiatric nurses		0.7	1.5	1.8	2.1	2.3	2.5	2.5	2.3	2.1	1.9	19.7
Addiction counselors		0.9	2	2.4	2.8	3.2	3.4	3.3	3.1	2.9	2.6	26.6
Peer recovery specialists		0.4	0.8	0.9	1.1	1.2	1.3	1.3	1.2	1.1	1	10.3
Social workers		0.5	1.1	1.3	1.6	1.8	1.9	1.9	1.8	1.6	1.5	15
Program assistants		0.3	0.7	0.8	1	1.1	1.2	1.2	1.1	1	0.9	9.3
Wrap-Around Services/Special	2.D											
Individuals in Criminal Justice System	2.D.i											
Universal screening on intake	2.D.i.1	0.02	0.02	0.02	0.02	0.02	0.02	0.02	0.02	0.02	0.02	0.2
Reentry & reintegration programs	2.D.i.3	3.1	3.1	3	2.9	2.7	2.6	2.6	2.5	2.4	2.4	27.3
Transitional housing	2.D.i.4	1.5	1.5	1.4	1.4	1.3	1.3	1.3	1.2	1.2	1.2	13.3
Treatment engagement on release	2.D.i.5	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	1
Individuals with Housing Instability	2.D.ii											
Permanent supportive housing	2.D.ii.1	3.2	4.6	6.4	8.3	10.4	11.2	11.3	11	10.4	9.8	86.6
Mental Health Services												
Mental health providers	2.E.1	0.65	0.85	1.05	1.25	1.5	1.55	1.6	1.55	1.5	1.4	12.9
Psychiatric medications	2.E.1	0.5	0.45	0.45	0.45	0.45	0.4	0.4	0.4	0.35	0.35	4.2
Coordination with clinical & MH services	2.E.2	0.8	1	1.2	1.4	1.7	1.8	1.8	1.8	1.7	1.6	14.8
TOTAL TREATMENT & RECOVERY		17.27	25.42	29.62	34.12	38.37	40.62	40.47	38.62	36.12	33.82	334.45

Mayor and City Council of Baltimore v. Purdue Pharma L.P., *et al.*
No. 24-C-18-515
Circuit Court for Baltimore City

ADDENDUM TO MEMORANDUM OPINION ON ABATEMENT REMEDY

Category 3: EDUCATION — Page 4

$ millions

CATEGORY/ITEM	PADULA REFERENCE	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	TOTAL
Health Professional Education	3.A											
Academic detailing	3.A.1	0.3	0.3	0.3	0.3	0.3	0.3	0.3	0.3	0.3	0.3	3
Patient & Public Education	3.B											
Mass Media Campaigns	3.B.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2	2
TOTAL EDUCATION		0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	5

Mayor and City Council of Baltimore v. Purdue Pharma L.P., *et al.*
No. 24-C-18-515
Circuit Court for Baltimore City

ADDENDUM TO MEMORANDUM OPINION ON ABATEMENT REMEDY

Category 4: SPECIAL POPULATIONS — Page 5

$ millions

CATEGORY/ITEM	PADULA REFERENCE	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	TOTAL
Children, Adolescents, Young Adults	4.A											
Screening, Treatment Initiation & Referral (STIR)	4.A.2	0.3	0.3	0.2	0.1	0.1	0.04	0	0	0	0	1.04
Children in Foster Care, etc.	4.B											
Support for Children in Foster Care	4.B.1											
Socio-emotional support		0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	1
Intensive parent-child intervention		0.7	0.7	0.7	0.6	0.6	0.6	0.6	0.5	0.5	0.5	6
Support for adopted children and families	4.B.2											
Socio-emotional support		0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.1
Intensive parent-child intervention		0.03	0.03	0.03	0.03	0.03	0.03	0.03	0.03	0.03	0.03	0.3
Support for children living with parents with OUD												
Socio-emotional support		1	1	1	1	0.9	0.9	0.9	0.8	0.8	0.8	9.1
Intensive parent-child intervention		3.05	3	2.95	2.85	2.7	2.65	2.55	2.45	2.35	2.3	26.85
Pregnant Women, New Mothers, and Neonates												
Prenatal and postpartum care	4.C.3											
Prenatal psychosocial services		0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.1	0.1	0.1	1.7
Postpartum psychosocial services		0	0.4	0.9	1.3	1.8	2.2	2.1	2.1	2	1.9	14.7
Housing and support services	4.C.4	0.9	0.9	0.9	0.8	0.8	0.8	0.8	0.7	0.7	0.7	8
TOTAL SPECIAL POPULATIONS		6.29	6.64	6.99	6.99	7.24	7.53	7.29	6.79	6.59	6.44	68.79

Mayor and City Council of Baltimore v. Purdue Pharma L.P., *et al.*
No. 24-C-18-515
Circuit Court for Baltimore City

ADDENDUM TO MEMORANDUM OPINION ON ABATEMENT REMEDY

Category 5: MONITORING — Page 6

$ millions

CATEGORY/ITEM	PADULA REFERENCE	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	TOTAL
Opioid Abatement Coordinating Unit	5.A											
Development & Assessment of New Abatement Strategies	5.A.1											
Director		0	0	0	0	0	0	0	0	0	0	0
Community organizers		0.25	0.25	0.25	0.25	0.25	0.3	0.3	0.3	0.3	0.3	2.75
Abatement Coordination & Review	5.A.2											
Director		0.2	0.2	0.2	0.2	0.2	0.2	0.3	0.3	0.3	0.3	2.4
Managers		0.2	0.25	0.25	0.25	0.25	0.25	0.25	0.25	0.3	0.3	2.55
Data scientists		0.3	0.3	0.3	0.3	0.4	0.4	0.4	0.4	0.4	0.4	3.6
Community liaisons		0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2	2
Staff assistants		0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	1
TOTAL MONITORING		1.25	1.3	1.3	1.3	1.4	1.45	1.55	1.55	1.6	1.6	14.3