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Attorneys for Plaintiff
CHRIS HILL

13 UNITED STATES DISTRICT COURT
14 EASTERN DISTRICT OF CALIFORNIA

16 CHRIS HILL,
17
18 Plaintiff,
19
20 vs.
21 NOVARTIS PHARMACEUTICALS
CORPORATION,
22
23 Defendant.

Case No. 1:06-CV-00939 AWI-DLB

**STIPULATED SCHEDULING
ORDER**

24 **STIPULATED SCHEDULING ORDER**

25 As ordered by the Court during the November 16, 2011 Scheduling Conference, the
26 parties hereby stipulate to, and request that the Court adopt, the proposed schedule set forth
27 below:

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	Deadlines/Events	Date
1		
2	File joint designation of MDL docket designations	12/9/11
3	Seek leave to add parties or otherwise amend pleadings	12/16/11
4	Plaintiff to identify damages witnesses who may be called at trial	1/9/12
5	Plaintiff to supplement responses to NPC's interrogatories and document requests	2/6/12
6		
7	NPC to file motion to apply New Jersey law to plaintiff's request for punitive damages ("Choice-of-Law Motion")	1/6/12
8	Plaintiff to file opposition to Choice-of-Law Motion	2/3/12
9	NPC to file reply in support of Choice-of-Law Motion	2/17/12
10	NPC to file motion to preclude punitive damages	within 30 days after Court issues ruling on Choice-of-Law Motion
11		
12	Plaintiff to file opposition to motion to preclude punitive damages	28 days after NPC files its motion
13	NPC to file reply in support of motion to preclude punitive damages	14 days after plaintiff files her opposition
14		
15	NPC to complete depositions of damages witnesses	6/1/12
16	NPC to complete any supplemental depositions of plaintiff's experts (if requested by NPC and permitted by the Court):	7/13/12
17	NPC to file <i>Daubert</i> and summary judgment motions	8/15/12
18	Plaintiff to file oppositions to NPC's <i>Daubert</i> and summary judgment motions	9/12/12
19	NPC to file replies in support of <i>Daubert</i> and summary judgment motions	9/26/12
20		
21	<i>Daubert</i> and summary judgment motions to be heard by Chief Judge Ishii	hearing date no later than 11/12/12
22	Final pretrial conference before Chief Judge Ishii	1/4/13 at 1:30 p.m.
23	Motions <i>in limine</i> , deposition designations, objections thereto, deposition counter-designations, objections thereto, objections to exhibits, proposed jury instructions, proposed voir dire questions	deadlines to be set at final pretrial conference
24		
25	Trial date before Chief Judge Ishii	2/26/13

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Seen and agreed:

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Dated: November 18, 2011

FARELLA BRAUN + MARTEL LLP

By: /s/ James H. Colopy
James H. Colopy

Attorneys for Defendant
NOVARTIS PHARMACEUTICALS
CORPORATION

Seen and agreed:

Dated: November 18, 2011

PITTMAN, GERMANY, ROBERTS & WELSH LLP

By: /s/ Robert G. Germany
Robert G. Germany

Attorneys for Plaintiff
CHRIS HILL

IT IS SO ORDERED.

Dated: November 28, 2011

/s/ Dennis L. Beck
UNITED STATES MAGISTRATE JUDGE